



National Aeronautics and
Space Administration
Washington, DC 20546

Procurement Class Deviation

PCD 25-04

June 17, 2025

CLASS DEVIATION FROM FEDERAL ACQUISITION REGULATION (FAR) PART 10 AND NASA FAR SUPPLEMENT (NFS) PARTS 1810 TO IMPLEMENT THE REVOLUTIONARY FAR OVERHAUL (NASA Case 2025-N007)

PURPOSE: To provide a Class Deviation from the FAR to implement the FAR Council's model deviation text to FAR Part 10 – Market Research and deviation to NFS 1810.

BACKGROUND: On April 15, 2025, the Executive Order (E.O.) 14275, [“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.” To implement E.O. 14275, the Office of Federal Procurement Policy (OFPP) is leading the **Revolutionary FAR Overhaul (RFO)** initiative. This effort is supported by the Federal Acquisition Regulatory Council (the Council) member agencies—which includes GSA, DOD, NASA, along with other agencies. In line with the E.O., the initiative aims to eliminate unnecessary regulations and policies across all levels of the federal government.

The Office of Management and Budget (OMB) memorandum, M-25-25 issued on May 2, 2025, titled, Overhauling the Federal Acquisition Regulation, provided additional guidance to federal agencies regarding the FAR overhaul.

FAR Streamlining. As part of the RFO, the FAR will be streamlined to include only statutory requirements, while non-statutory content will move to new buying guides, collectively forming the Strategic Acquisition Guidance (SAG). The Council will first issue model deviation guidance by FAR part, followed by formal rulemaking through the notice-and-comment process. Agencies will have 30 days to issue class deviations based on the model text once it is released.

Streamlining Agency Acquisition Supplements. Agencies must streamline their FAR supplements by removing regulations not based on statute or executive orders and aligning with the FAR Council's deviation guidance. Supporting policies must also be updated to reflect these changes. This approach ensures the NASA FAR Supplement (NFS) remains consistent with the streamlined FAR.

FAR Buying Guides and NFS Companion Guide (CG) (coming soon). As the FAR and the NFS are streamlined, helpful non-regulatory content will be moved to new FAR Buying Guides and NFS CG. These guides are intended to offer practical instructions and best practices for implementing effective contracting methods.

RFO Part 10 – Market Research, is the second of the model deviations released by the FAR Council. RFO Part 10 establishes minimum requirements for conducting market research before procuring supplies and services. Burdensome, duplicative, or outdated language and language not required by statute have been removed from FAR Part 10. This plain language version of FAR Part 10 shall be adhered to.

To align with the RFO FAR Part 10, the NFS 1810 – Market Research, is revised to remove non-statutory and outdated language. As such, NFS Part 1810 is “Reserved”.

GUIDANCE: Contracting officers shall follow the RFO Part 10 deviated text instead of FAR Part 10 as codified at 48 CFR Chapter 10. The FAR Council’s RFO text is available at <https://www.acquisition.gov/far-overhaul>.

Contracting officers shall follow the enclosed NFS Part 10 deviated text. Non-statutory instructions will be provided in the NFS Companion Guide.

ACTION REQUIRED BY CONTRACTING OFFICERS:

Effectively immediately, ensure that new contract actions issued on or after the effective date complies with the policy in the PCD.

EFFECTIVE DATE: This PCD is effective as dated and shall remain in effect until implemented in the FAR and NFS or otherwise rescinded.

PROVISION AND CLAUSE CHANGES: N/A

HEADQUARTERS CONTACT: Tania B. Mitchell, Sr. Procurement Analyst, Procurement & Grants Policy Division, tania.b.jmitchell@nasa.gov.

Karla Smith
Jackson



Digitally signed by Karla
Smith Jackson
Date: 2025.06.24
18:49:54 -04'00'

Karla Smith Jackson
Assistant Administrator for Procurement
Enclosure

Changes in the NFS Deviation text below are identified as follows:
Deletions shown as ~~strike throughs~~; and
Additions shown as

PART 1810
MARKET RESEARCH

[RESERVED]
~~TABLE OF CONTENTS~~

1810.002 ~~Procedures.~~

~~—PART 1810~~
~~MARKET RESEARCH~~

~~1810.002- Procedures.~~

~~(e) For procurements exceeding the simplified acquisition threshold (SAT), the contracting officer shall document the results of their market research utilizing NASA Form (NF) 1787A. For procurements under the SAT, use of the NF 1787A is optional for documenting the results of market research.~~

~~[PN 22-05]~~

PART 1810
MARKET RESEARCH

RESERVED