Revolutionary Federal acquisition Regulation Overhaul (RFO) Frequently Asked Questions (FAQs)

The questions and answers below are intended to help the acquisition workforce, contractors, and other stakeholders and interested parties understand the purpose of, and planned implementation approach to, the Revolutionary FAR Overhaul initiative.

The FAQs provide information on the following topics:

- 1. General RFO Initiative
- 2. FAR Deviation Process & Model Deviation Text
- 3. Non-regulatory Guidance
- 4. Impact on Vendors/Industry
- 5. Transition to the New Streamlined FAR: Timing and Implementation Coordination
- 6. Agency-Specific Actions and Implementation
- 7. Testing and Feedback

1. General RFO Initiative

a. What is the purpose of the Revolutionary FAR Overhaul (RFO) and how is it being implemented?

The Revolutionary FAR Overhaul (RFO) is a government-wide initiative to comprehensively streamline and simplify the Federal Acquisition Regulation (FAR) by returning it to its statutory roots. The RFO represents the most significant update to the FAR in over 40 years. Led by OFPP in partnership with the FAR Council, the RFO implements Executive Order 14275 Restoring
Common Sense to Federal Procurement
and OMB Memo M-25-26 Overhauling the Federal Acquisition Regulation
by rewriting the FAR in plain language and removing most text not required by statute or Executive Order (EO), other than that which is essential to sound procurement. The initiative also captures key content removed from the FAR in non-regulatory buying guides, tools, and other resources that provide flexible, practical strategies for applying the streamlined regulation to real-world acquisitions. Together, the FAR and the non-regulatory resources are referred to as Strategic Acquisition Guidance. The RFO is being implemented through two coordinated and parallel tracks:

- Track 1 involves the rewrite of the FAR in plain language and removal of content not required by statute or Executive Order, such as procedural requirements and detailed process steps that are not essential to Government-wide policy. Statutory and or Executive Order requirements are being reviewed to determine if clarification or alternative interpretation can promote better procurement outcomes. These rewritten FAR parts are issued as model deviation text, which agencies are expected to adopt until the FAR is formally revised through the rulemaking process. The model text is expected to serve as the foundation for future revisions.
- Track 2 involves the development of non-regulatory, non-mandatory buying guides, technology-enabled tools, and other resources, such as Practitioner Albums, to help the

contracting workforce apply the streamlined FAR in real-world buying scenarios. These resources preserve the value of key content removed from the FAR by capturing, in one location, sound practices that are in a format the contracting workforce can tailor to the needs of the acquisition.

b. Why is the FAR being overhauled?

Over time, the FAR has become increasingly complex, with the addition of many requirements not based on statute or Executive Orders, that limit contracting officer discretion and innovation. These requirements place unnecessary burden on Government employees and contractors. The RFO seeks to improve the Federal buying experience by refocusing the FAR on its statutory roots, removing mandates that are not required by statute or EO and instead offering practitioner best practices that support mission-focused, common-sense acquisition practices that lower transaction costs and barriers to entry for contractors.

c. Are all policies and practices underlying non-statutory rules being rescinded?

No. If the policy or practice is based on an Executive Order or is essential to sound procurement, it will be retained in the FAR. If the policy or practice is beneficial but not mandatory, it will be addressed in the non-regulatory, non-mandatory formats, such as in a Practitioner Album, buying guides, and other resources that can be updated more easily, tailored by need, and used to empower, rather than constrain, the contracting workforce. If the policy or practice is outdated, redundant, or otherwise unnecessary, it will be eliminated.

Federal Acquisition Regulation Statutory and Executive Non-Statutory Rules Order-Based Rules Retain in FAR if Retain other helpful essential to sound coverage outside the Retain in FAR, but procurement, i.e., FAR, but on common consider if supports simplicity and platform with FAR, Delete if outdated, clarification or usability, strengthens using coverage that redundant, or the efficacy of the best improves the alternative otherwise unnecessary procurement system, federal buying interpretation can or protects economic experience and helps promote better or national security the workforce buy procurement interests smarter

d. If policies and practices are removed from the FAR but the contracting officer finds that their use is beneficial, should they continue using them?

Yes. Policies and practices that are not required by statute or Executive Order but remain beneficial may be addressed in non-regulatory, non-mandatory formats. This will encourage contracting officer discretion in determining whether a practice is suitable rather than a matter of compliance. Unless specifically prohibited in the FAR, contracting officers maintain the discretion to use policies and practices removed through the RFO. When combined with robust non-regulatory resources, the streamlined FAR should make it easier for the workforce to follow the guiding principles of good acquisition stewardship set forth in the rewritten FAR Part 1. The guiding principles include ensuring the most effective use of taxpayer dollars in ways that recognize the value of time, encourage innovation, promote merit-based decision-making, and satisfy the customer.

e. For more than four decades, the FAR has been a one-stop resource for understanding all the key Government-wide buying policies and practices. Why is the RFO moving away from this model and how will the RFO improve the Federal buying experience if buyers and sellers must now look to multiple sources to understand Government-wide procurement policies and practices?

The FAR will continue to serve as a central source of regulation addressing critical guardrails and practices that are essential to sound procurement. But the longstanding practice of relying on a regulation as the predominant mode of Government-wide information dissemination is being reformed because the continuation of thousands of regulatory mandates covering every aspect of the acquisition lifecycle has unnecessarily constrained the workforce's ability to exercise real discretion. The overwhelming number of regulatory mandates has also complicated our ability to attract new entrants into the Federal marketplace and persuade seasoned Federal contractors that innovation and best value are more important than being able to navigate the maze of Government-unique requirements that are embedded in all but the smallest transactions.

The large-scale reduction of regulatory mandates will, for the first time, give contracting officers actual power to determine when many Government-wide policies and practices are suitable. And, the accompanying non-regulatory practitioner-inspired best practices and category-specific buying tips should make it easier for contracting officers to use their new-found discretion efficiently to make smarter buying decisions.

The RFO webpages on acquisition.gov are designed so that buyers can easily find non-regulatory content associated with each published regulatory deviation (set forth in a "Practitioner Album"). Contracting officers will continue to benefit from accessing relevant Government-wide resources in one location. Over time, technology will enhance the delivery of regulatory and non-regulatory materials so that they can be accessed seamlessly on a "Strategic Acquisition Guidance" platform and applied at the speed of need.

f. If contracting officers want to test out streamlined procurement practices developed by their peers or seek assistance trying out their own new ideas as the acquisition system is deregulated, where can they go for assistance?

The FAR Council views the period from when an agency adopts model deviation text until rulemaking as a "testing period." Contracting officers' implementation of model deviation text and buying guides is part of testing, as are novel approaches contracting officers leverage to streamline and enhance procurement processes. The FAR Council encourages such tests and is sponsoring a testing framework supported by acquisition innovation advocates and innovation coaches with feedback loops. The workforce may email SAGTesting@gsa.gov to seek the help of an innovation coach or share results from tests. We encourage you to contact your local policy office as well.

g. Are agencies not governed by the FAR required to participate in the FAR Overhaul and comply with OMB Memo M-25-26?

No. Agencies not subject to the FAR are not required to participate in the FAR Overhaul or comply with OMB Memo M-25-26. However, they are encouraged to consider adopting the guides, tools, and other resources and streamlined approaches developed under the FAR Overhaul, consistent with applicable laws.

2. FAR Deviation Process & Model Deviation Text

a. What is model deviation text?

Model deviation text is language developed by the FAR Council that agencies are expected to implement through their own deviations to the FAR. Model deviation text represents a streamlined FAR part that is rewritten in plain language and removes content not required by statute or Executive Order. The text serves as a preview of what is being considered for incorporation into the FAR through the formal notice and comment rulemaking process. Implementation of model deviation text by agencies allows the FAR Council to gather informal feedback, test practical application, and identify needed refinements before initiating the formal rulemaking process.

b. How does an agency adopt model deviation text?

An agency adopts model deviation text by issuing a class deviation in accordance with FAR Part 1 and any agency-specific regulations and/or internal procedures. Adoption of model deviation text enables the agency to begin using the streamlined FAR part until the FAR is revised through the formal rulemaking process. Deviations issued by the FAR Council agencies — NASA, GSA, and DoD — are posted Part 1 on acquisition.gov RFO webpages and can serve as examples for how agencies may incorporate the model text into their own class deviations. The model deviation text for a particular FAR part is not applicable to an agency until the agency has issued a class deviation.

c. Are agencies required to adopt the model deviation text?

Yes. Agencies are expected to adopt the model deviation text by issuing class deviations as part of their implementation of OMB Memo M-25-26, Overhauling the Federal Acquisition

Regulation. To confirm whether an agency has issued a class deviation for a particular FAR part, visit the RFO webpage at https://www.acquisition.gov/far-overhaul/far-part-deviation-guide.

d. Can agencies modify the model deviation text before adopting it?

Agencies must request approval from the FAR Council before issuing RFO class deviations that use text that differs from the FAR Council's class deviation text, unless the difference is necessary to address agency-specific statutory direction. Agencies must send the planned deviation language, an explanation for the difference, and a point of contact to the FAR Council at GSARegSec@gsa.gov. For more information, see the FAR Council's RFO Deviation Guidance.

e. Will the model deviation text eventually become part of the FAR?

Once model deviation text has been issued for all FAR parts, the FAR Council will initiate the formal rulemaking process to incorporate the deviation text into the FAR, which could be modified after consideration of feedback received.

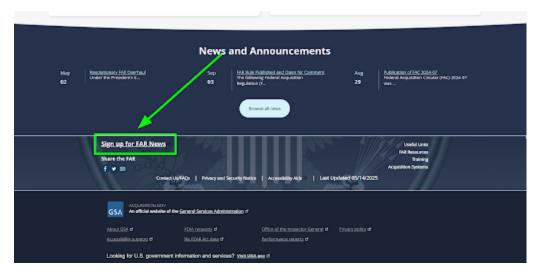
f. How can I quickly understand what is being changed by model deviation text?

In general, when model deviation text is issued for a particular FAR part and posted <u>Part 1</u>, the text will reflect the removal of content not required by statute or Executive Order and the rewriting of retained requirements in plain language. This information will be included in the FAR part "Practitioner Album" along with a "line-out" version showing what has been deleted. Note the line-out is not a direct match as it does not show what has been added or moved.



g. How can I receive updates when new rewritten FAR parts are released?

To stay updated on changes to the FAR, including when new rewritten FAR parts are released, subscribe to FAR News at https://www.acquisition.gov/.



3. Non-regulatory Guidance

a. How will non-regulatory information be deployed?

Every deviation released as part of the RFO will be accompanied by a menu of non-regulatory information that lists the resources developed to support the workforce in implementing the deviation. The menu will include a "Practitioner Album" with related learning assets including a summary of changes made by the deviation, the line-out document highlighting what was removed from the FAR, additional resources for the workforce based on the applicable FAR part, such as:

- best practices set forth in a general buying guide (e.g., a FAR companion guide);
- category management-aligned buying guides that show users how to easily navigate appropriate pathways;
- "smart accelerators" and other practitioner-inspired knowledge nuggets.

The Practitioner Album will be available in the "Non-regulatory Resources" box for each FAR part that has completed model deviation text. FAR parts with completed model deviation text can be found on RFO webpages at https://www.acquisition.gov/far-overhaul/far-part-deviation-guide. In addition to deploying non-regulatory resources on RFO webpages, we intend to leverage the Cornerstone OnDemand (CSOD) platform to facilitate continuous learning point (CLP) credit for members of the Federal acquisition workforce as they review Practitioner Album resources and learn through new pathways. In the future, we will migrate to a more interactive resource that leverages technology to efficiently deliver the information buyers need.



b. Will buying guides include mandates or become part of the FAR?

No. Buying guides are non-mandatory resources developed to support the contracting workforce in applying the streamlined FAR. They will provide best practices and practical procedural assistance to help users navigate the most effective way to make a purchase, depending on where you are in the procurement process or what you're buying, e.g., information technology, professional services, and construction.

c. When will buying guides be released?

Buying guides are under development and will be released over time at www.acquisition.gov/far-overhaul and updated regularly. As part of the Strategic Acquisition Guidance (SAG), they are designed to remain outside the FAR but easily accessed through the same platform where FAR content is shared.

d. Who develops the buying guides?

Buying guides are developed in collaboration with experienced practitioners, Government-wide category managers, and acquisition innovation advocates.

e. Why is non-regulatory content being developed in a variety of forms?

The FAR Council is committed to improving the Federal buying experience for the contracting workforce and contractors and does not want to presume that one particular form and presentation of content is optimal for all. To this end, the FAR Council is partnering with the Federal Acquisition Institute, the Defense Acquisition University, seasoned agency practitioners, category managers, acquisition innovation advocates, and technologists.

Successful cultural adoption and adaptation requires interactive communication channels between thought leaders and champions and, especially, with the workforce at large to help them overcome implementation challenges. Road shows, "office hours," interactive webinars, etc. will be used to invite continual user feedback. Information on these events will be posted on the RFO webpages on https://www.acquisition.gov/far-overhaul.

4. Impact on Vendors/Industry

a. How will the RFO affect Federal contractors?

The RFO will not change statutory requirements or create new regulatory burdens for contractors. The RFO will simplify the FAR and support development of common-sense non-regulatory buying guides and related information to support more robust market research and

communication with contractors. The intent is to provide clearer solicitations, streamlined requirements, and to reduce administrative burden.

b. Do contractors need to take any action as part of the RFO?

No formal action is required. All interested parties are encouraged to stay informed about the changes and to provide informal feedback on model deviation text. Each FAR part with completed model deviation text, available at https://www.acquisition.gov/far-overhaul/far-part-deviation-guide, allows feedback to be submitted.



c. Will there be differences between agencies during the transition?

Because each agency adopts model deviation text over a period of time, there may be some variation in solicitation language or structure, but these variations should generally be limited in duration. Agencies are expected to adopt and start using the model deviation text within 30 days of when the FAR Council issues the text. The follow-on formal rulemaking will also help to rationalize practices Government-wide.

d. How can vendors stay informed about the RFO?

Vendors can follow updates on the official RFO site at www.acquisition.gov/far-overhaul, where model deviation text, guidance, and information about the transformative initiative are posted.

5. Transition to the New Streamlined FAR: Timing and Implementation Coordination

a. How will the transition to the new codified streamlined FAR take place?

The FAR is being rewritten as model deviation text, but not all at once. This will allow agencies to adopt and apply each part as it is issued, via class deviation, rather than waiting to complete the lengthy rulemaking process that will formally revise the FAR. The FAR Council will issue rewritten FAR parts as model deviation text and agencies will adopt it by issuing their own FAR deviations. Once all FAR parts have been rewritten as model deviation text, the FAR Council will begin formal notice and comment rulemaking to codify the streamlined FAR with public input. Until the streamlined FAR is finalized through formal rulemaking, agencies will continue using their deviations.

b. What happens during the transition period and how will consistency be maintained?

During the transition, the FAR Council expects agencies to adopt the model deviation text as issued to help ensure government-wide consistency during the transition to the streamlined FAR. Buying guides and other tools and resources, such as the use of innovation coaches, will help support consistent application across the workforce.

c. When will formal rulemaking begin?

Formal rulemaking will begin once all FAR parts have been rewritten and issued as model deviation text. The rulemaking process will consider lessons learned and feedback received during the transition.

6. Agency-Specific Actions and Implementation

a. What are agencies expected to do as part of the RFO?

Agencies are expected to adopt the model deviation text issued by the FAR Council, align agency supplements and policies with the streamlined FAR, engage their acquisition workforce, and provide feedback on implementation challenges and successes.

b. Who is responsible for leading RFO implementation at each agency?

Each agency must designate an RFO implementation official, typically the agency's the most senior procurement official, such as the Senior Procurement Executive (SPE), to oversee adoption of deviations, coordinate agency implementation, and serve as the main point of contact with OFPP.

c. Do agencies need to revise their agency supplements?

Yes. Agencies are expected to revise and streamline their FAR supplements and internal policies to minimize regulations that are not based in statute or Executive Order and ensure alignment with the streamlined FAR provisions introduced through model deviation text.

d. Are agencies required to report on their implementation progress?

Yes. Agencies are required to provide quarterly updates to OFPP on their adoption of model deviation text and implementation efforts.

7. Testing and Feedback

a. What does it mean to "test" model deviation text and non-regulatory resources?

Testing means applying the model deviation text and using non-regulatory resources, such as strategies in buying guides and innovation training aids, in actual procurements prior to formal rulemaking, where we can learn from the implementation and enhance final outcomes. Agencies should encourage their workforce to implement new procurement practices and tests as soon as they issue their deviations and to provide feedback to SAGTesting@gsa.gov on results, including clarity, usability, and impact of the deviation text and non-regulatory resources.

b. What is an innovation coach and how do they support testing?

An acquisition innovation coach is an experienced acquisition professional available through GSA or within an agency, such as through an internal innovation lab or similar team, to help acquisition teams apply model deviation text and buying guide strategies. Coaches support workforce teams by offering practical assistance, facilitating structured testing, and helping capture useful insights that may inform FAR updates and non-regulatory resources.

c. Is using an innovation coach considered "testing"?

Yes. When agencies work with innovation coaches to apply deviation text or non-regulatory resources, such as buying guides, to actual acquisitions, this is a form of structured testing. These engagements help ensure that model deviation text, buying guides, tools, and other resources are practical, clear, and applicable to real-world procurement challenges. However, feedback from all testing experiences is valued, including those conducted without the support of an innovation coach. Agencies are encouraged to share insights from any application of RFO materials, e.g., model deviation text, buying guides, Practitioner Albums, etc.

d. What kinds of testing approaches should agencies consider in support of the RFO?

Agencies are encouraged to consider a range of approaches to test model deviation text and buying guides for clarity, usability, and impact, including:

- capturing structured feedback from contracting teams;
- reviewing artifacts such as solicitations, evaluation plans, and post-award compliance;
- comparing outcomes with traditional FAR-based buys;
- facilitating workforce feedback sessions and focus groups; and
- working with innovation coaches, agency acquisition innovation advocates (AIAs), and agency-designated industry liaisons.

e. Are agencies expected to allow the workforce to test deviations and provide feedback on buying guide materials?

Yes. Agencies should ensure that workforce participation is coordinated and that staff are provided appropriate leeway when using new tools or guidance.

f. How do I request an innovation coach and do I need permission from my agency?

The workforce can request an innovation coach by emailing SAGTesting@gsa.gov: include a brief description of your procurement, the FAR part or buying guide involved, and the type of support you are seeking (e.g., testing new market research techniques). Before submitting a request, coordinate with your agency's acquisition leadership, RFO point of contact, or policy office, as they may already be organizing internal testing or want to align your request with broader agency goals.

g. How is feedback from testing collected?

Feedback can be submitted informally through SAGTesting@gsa.gov. Agencies may also gather internal feedback through policy offices, user surveys, or direct workforce engagement and send it to SAGTesting@gsa.gov.

h. What type of feedback is most useful?

The FAR Council is especially interested in feedback about clarity, usability, and effectiveness of the model deviation text and buying guide content, including what worked, what was confusing, and where additional support may be needed.

i. Will feedback influence the final FAR parts?

Yes. Both informal and formal feedback will influence the final FAR parts. Informal feedback is being collected through agency implementation of model deviation text, buying guides, and other RFO resources, such as Practitioner Albums. This informal feedback will provide the FAR Council with insights on any areas that may need refinement. In addition, comments received during the formal rulemaking period will be considered. Together, this formal and informal feedback will inform the final updates to the FAR.

j. Is feedback being sought on the presentation of content in the Practitioner Album? Yes. The FAR Council is eager to receive feedback from the workforce on the presentation of materials in the Practitioner Album, such as whether the information is logically organized, presented at the right level of detail, or missing any key content. Workforce members are encouraged to share input through their agency <u>Acquisition Innovation Advocate (AIA)</u>.

Direct questions regarding this notification to OAG's Division of Acquisition Support (DAS) at <u>^FM OAG DAS PPCAB</u>.