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DEFENSE HEALTH INFORMATION
TECHNOLOGY SYMPOSIUM

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HYATT REGENCY NEW ORLEANS
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Revolutionary Federal Acquisition Regulation (FAR) Overhaul (RF0)

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Agenda

- 1** What is the Revolutionary Federal Acquisition Regulation (FAR) Overhaul (RFO)
- 2** Why do we have it
- 3** How do you know when you see it
- 4** Where do you find it
- 5** What has been overhauled

Speaker Introduction



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Learning Objectives

- 1** Discuss Key Principles and Proven Practices, Explanatory Material, and Implementation Guidance
- 2** Centers on customer satisfaction by prioritizing mission outcomes, timely delivery, and value to end users
- 3** Promotes use of commercial products and services to streamline acquisition and leverage market innovation
- 4** Reinforces competitive procurement as a means to drive value, performance, and accountability
- 5** Encourages innovative approaches by empowering acquisition teams to exercise sound judgement and adapt strategies

What is the Revolutionary Federal Acquisition Regulation (FAR) Overhaul (RFO)

- The RFO is a comprehensive overhaul of the FAR driven by:
 - Executive Order 14275, “Restoring Common Sense to Federal Procurement,” and OMB Memo M-25-26, “Overhauling the Federal Acquisition Regulation”
 - Rewrites FAR Parts in plain language, strips out requirements not grounded in Statute or Executive Orders
 - Provides useful but non-mandatory practices into Strategic Acquisition Guidance (SAG) that are Non-regulatory i.e., Buying Guides, FAR Companion Guide, and Practitioner Albums that distill best practices, techniques, and tools
 - The RFO is the mechanism that will help deliver modernized, data-driven health IT to the operator more quickly.
- Led by the Office of Federal Procurement Policy (OFPP) and the FAR Council (DoD, GSA, NASA, OMB), with GSA providing the central acquisition.gov platform
- Each agency’s most senior procurement official is designated as internal RFO implementation lead, responsible issuing class deviations, aligning supplements, and reporting progress to OFPP

RFO Statistics

Part	Word Count			Readability (Flesch-Kincaid)			Shalls/musts		
	Current	RFO	Net	Current	RFO	Net	Current	RFO	Net
1	8166	3631	-4535	13.9	13.1	-0.8	90	43	-47
2	15336	14608	-728	16.5	16.5	0.0	11	11	0
3	17722	15005	-2717	16.5	16.1	-0.4	132	117	-15
4	22789	7817	-14972	15.5	13.8	-1.7	214	76	-138
5	8001	1961	-6040	15.4	11.8	-3.6	86	10	-76
6	7053	3538	-3515	14.6	13.4	-1.2	67	27	-40
7	9509	4845	-4664	15.5	15.2	-0.3	65	32	-33
8	15331	2251	-13080	14.2	14.8	0.6	208	27	-181
9	23367	19673	-3694	16.8	16.6	-0.2	258	131	-127
10	1352	322	-1030	17.2	13.8	-3.4	8	6	-2
11	6397	2927	-3470	16.8	17.1	0.3	69	26	-43
12	8772	5987	-2785	16.7	13.6	-3.1	79	16	-63
13	10883	921	-9962	15.1	13.9	-1.2	97	3	-94
14	14917	10826	-4091	14.0	13.7	-0.3	257	127	-130
15	32498	28143	-4355	15.6	14.3	-1.3	386	286	-100

RFO Organization

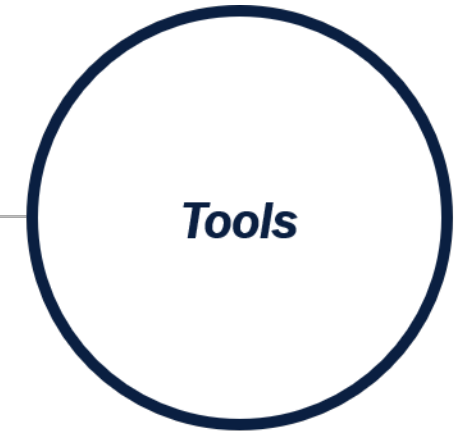


Examples: FAR and Agency Supplements, such as the DFARS, issued as Deviations

Previously- inconsistently comingled



Examples: FAR Companion, DoD Procedures, Guidance, and Information (PGI). Category Management Buying Guide



Examples: Practitioner Album, including line-out text and samples

DoW Deviations

- DoW implements its RFO changes to the Defense FAR Supplement (DFARS) through Class Deviations, that help bridge the gap between the codified FAR and future regulations.
- Deviations allow agencies to:
 - Replace existing text and adopt new language in lieu of current FAR provisions for specific parts or sections
 - Use new language immediately without waiting for formal, regulatory rulemaking of completion
 - Connect current procurement practices with future streamlined regulations, ensuring continuity during the overhaul process

RFO Phases

- Phase 1, *completed 1 FEB 2026*
 - Part-by-Part revisions to the FAR, posted to the RFO website, that agencies adopted via class deviation as each Part was overhauled. That phase is completed, and numerous agencies have issued solicitations and contracts with the overhauled terms.
- Phase 2, *beginning 23 JUN 2026*
 - FAR Council published in the Federal Register proposed rules to revise 20 FAR Parts, including the contract clauses within FAR Part 52 associated with those Parts, through formal notice-and-comment rulemaking. This second phase will be continuing through 2026 with further notices of proposed rulemaking and an anticipated goal of completing the formal rulemaking process by the end of 2026.

DoW Deviations To Date

- **37 Class Deviations, effective 1 February 2026:**
 - 1, 3, 5, 6, 7, 10, 11, 12, 13, 14, 17, 18, 19, 23, 24, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 39, 40, 41, 43, 44, 46, 48, 49, 50, 52
- **Effective 17 February 2026:**
 - 4, 9, 22, 25
- **Effective 16 March 2026:**
 - 8, 15, 16, 42, 45, 47
- Phase II (formal rulemaking) will continue throughout 2026.

Summary Moderate Impact of FAR Changes So Far (1 of 6)

FAR Part	Impact	Takeaways (High-Level. Not an Exhaustive List of changes)
Part 8 – Required Sources of Supplies and Services Link	Moderate	• Mandates use of <u>required use contracts</u> unless exception is provided by the head of the contracting activity. • New mandates for <u>contractors to use government supply sources</u> (e.g., GSA Schedules) to support contracted work. Use of Best-in-Class contracts will continue to be prioritized but not mandated • There is a forthcoming requirement for agencies to utilize government-wide Tier 4 Tier 4 “Required Use” Contracts (See Slide 18 in linked attachment) • <u>GSA Federal Supply Schedule ordering procedures</u> have been moved to the General Services Acquisition Manual (GSAM/R) part 538 for timely and efficient maintenance, consistent with statutory analysis of the Federal Supply Schedule (FSS) program • GSAM <u>streamlines the ordering process language</u> and removes the distinction between requirements requiring a statement of work, and those that don’t • Removes requirement of <u>consideration of small business</u>, veteran-owned, HUBZone, etc., when using non-mandatory sources. FAR 8 New does not include this explicit requirement. Language may be redundant text included in Part 19 • GSA has already initiated MAS RFO changes. Changes started in November 2025 (GSA Refresh #s 30-32) MAS Solicitation Refreshes Vendor Support Center. Includes mods for areas like new clauses, SIN Updates, etc. • GSA is establishing <u>multiple enterprise agreements</u> for discounts and preferable terms for software and AI in support of its OneGov Strategy: What is OneGov?

Summary Moderate Impact of FAR Changes So Far (2 of 6)

FAR Part	Impact	Takeaways (High-Level. Not an Exhaustive List of changes)
Part 12 – Acquisition of Commercial Products and Commercial Services Link	Moderate	• <u>Part 12 now provides self-evident</u> (e.g., less cross-reference) simplified procedures for procurement of commercial items and services (previously, the FAR required users to combine Part 12 with the procedures listed in Part 13, 14, or 15) • The \$9 million ceiling for <u>simplified procedures</u> is <u>increased to \$15 million</u> under certain circumstances (contingency, disaster, emergency, defense against attack) • Adds explicit <u>prohibition on using cost-reimbursement contract types</u> for commercial products or services • The changes to make Part 12 are considered to have “moderate” impacted based on: ○ Part 12 processes are more self-contained and not reliant on other sections of the FAR ○ The thresholds for commercial items/services have been increased ○ Throughout the FAR there is a strong promotion of procurement of commercial supplies and services over other alternatives

Summary Moderate Impact of FAR Changes (3 of 6)

FAR Part	Impact	Takeaways (High-Level. Not an Exhaustive List of changes)
Part 13 - Simplified Procedures for Noncommercial Acquisitions Link	Moderate	• Name changed from Simplified Acquisition Procedures to Simplified Procedures for Noncommercial Acquisitions • Makes a clear distinction between simplified procedures for noncommercial acquisition and commercial acquisitions which are now covered in FAR part 12 model deviation • Focus on Simplified procedures for the acquisition of noncommercial products and services valued at or below the simplified acquisition threshold (SAT) • Clauses changed to reflect noncommercial and prohibits use of commercial clauses for noncommercial acquisitions

Summary Moderate Impact of FAR Changes (3 of 6)

FAR Part	Impact	Takeaways (High-Level. Not an Exhaustive List of changes)
Part 15 – Contracting by Negotiation	Moderate	• “<u>Discussions</u>” is replaced with “Negotiations” • “<u>Deficiency</u>” removed “a combination of significant weaknesses” and replaces with “part of an offer that does not conform to a material requirement of a RFP” • “<u>Clarifications</u>” permit minor corrections but do not allow for proposal revision and cannot be used to cure proposal deficiencies or material omissions • “<u>Proposal revision</u>” is updated to include the phrase “material elements of a proposal”. This revision clarifies that not every change made during negotiations constitutes a proposal revision • Contracting officers <u>must negotiate with each responsible offeror within the competitive range</u> and may further negotiate with the offerors as needed. Having further negotiations with one offeror does not require the contracting officer to have further negotiations with other offerors • <u>Competitive Range</u> is now clearly defined as “the group of evaluated proposals that the contracting officer determines are <i>best suited for further negotiation</i>” instead of “all of the most highly rated proposals” • <u>Recommendation</u>. Training is needed to ensure stakeholders fully understand these changes, ensuring they don’t continue to apply old definitions and processes for Part 15 negotiations

Summary Moderate Impact of FAR Changes (4 of 6)

FAR Part	Impact	Takeaways (High-Level. Not an Exhaustive List of changes)
Part 16 – Types of contracts Link	Moderate	• Updated promotes the use of <u>On-Ramps and Off-Ramps</u> for Multiple-Award IDIQ Contracts to ensure vendor pools are and current, competitive, and innovative • Allows CO use of contract types not explicitly listed unless explicitly prohibited. • <u>BPA's are now permitted</u> under multiple-award contracts, similar to how they are permitted under Federal Supply Schedules (GSA agreements) • Provides ability to further <u>reduce the pool of Vendors</u> eligible for awards for a program (not the full pool of IDIQ Vendors, just the Vendors awarded BPAs under the IDIQ) • BPAs can be single or multiple award • If they do establish a multiple-award BPA, agencies must still follow fair opportunity rules (not a blank check to award freely) • Individual <u>IDIQs must be explicitly modified</u> to allow for BPAs • Existing best-in-class (BIC) IDIQ contracts (e.g., OASIS+, ALIANT 2, VETS) will need to modify their contracts to make this effective. • RFO changes (including BPA authorization) have already been implemented under some GSA BIC contracts/solicitations (e.g., OASIS+ & OASIS Solicitation)

Summary Moderate Impact of FAR Changes (5 of 5)

FAR Part	Impact	Takeaways (High-Level. Not an Exhaustive List of changes)
Part 19 – Small Business Link	Moderate	• A requirement is <u>automatically released from the 8(a) program</u> if the follow-on will be set aside under the HUBZone, SDVOSB, or WOSB programs • <i><u>The contracting officer is required to first “attempt” a competitive 8(a) order</u></i> using government-wide contracts before considering a sole source 8(a) award. This could increase Procurement Administrative Lead Times and schedule risk for contracts or orders expiring in FY26 • Proposed OPM legislative language would modify the Small Business Act regarding simplified acquisition thresholds. This could impact solicitation and award strategies involving small business. • <u>Emphasis on competitive actions</u> over sole source will likely require clear documentation showing the rationale and need to sole source actions • The FAR Part 19 revision language does not appear to impact statutory procedures such as preference for <u>Indian Economic Small Business Enterprise</u> in accordance with 25 U.S.C. § 47 Buy Indian Act • Proposed Senate legislation & DoW , associated with changes under FAR Part 19 deviation language, <u>could suspend 8(a) sole source actions</u> until an audit of the 8(a) program is completed

Key Take-Aways – Low Impact FAR Changes

FAR Part	Impact	Takeaways (High-Level. Not an Exhaustive List of changes)
Part 4 – Administrative and Information Matters Link	Low	- Digital Signatures are explicitly authorized - Offers are required to have a SAM registration when they submit an offer <u>and</u> at the time of award
Part 7 – Acquisition Planning Link	Low	Removes prescriptive checklists in favor of dynamic planning process and delineates acquisition planning requirements between contracts and task/deliver orders
Part 10 – Market Research Link	Low	More flexible - No longer prescribes specific research techniques
Part 33 – Protests, Disputes, & Appeals Link	Low	- Overall, this FAR part <u>promotes the filing of protest at the Agency Level</u> (as opposed to GAO or the Federal Courts) - Contracting officers are required to <u>report protests to the head of contracting activity</u> (HCAs) as soon as practicable after filing to raise the profile of agency level protests to senior agency officials - DoW will update the DFARS (effective date 6/2026 under 2026 NDAA) to require losing <u>bid</u> protesters to pay for unsuccessful protest at GAO.
Part 36 – Construction and Architect-Engineer Link	Low	"12 percent rule," mandated that prime contractors perform 12% of the total contract work with their own forces, is removed
Part 44 – Subcontracting Policies & Procedures Link	Low	The <u>use of Administrative Contracting Officer (ACO)</u> is no longer used as a designation. The part now reflects "Contracting Officer"

* Full list of low-impact changes can be found in back-up slides [here](#).

Threshold Rollup – Acquisition.Gov Portal

Threshold Changes - October 1st, 2025

Effective Date: October 1, 2025

Search:

Threshold Category	Previous Threshold	New Threshold Effective Oct 1, 2025	FAR Citation	RFO Citation
Major system	\$2,500,000	\$3,000,000	2.101	2.101
Micro-purchase Threshold (MPT)	\$10,000	\$15,000	2.101	2.101
MPT - Contingency Operations	\$20,000	\$25,000	2.101 13.201(g)(1)	2.101
MPT - Defense Support	\$35,000	\$40,000	2.101 13.201(g)(1)	2.101
Simplified Acquisition Threshold (SAT)	\$250,000	\$350,000	2.101	2.101
SAT - Contingency Operations	\$800,000	\$1,000,000	2.101	2.101
SAT - Defense Support	\$1,500,000	\$2,000,000	2.101	2.101
SAT - Humanitarian / Peacekeeping	\$500,000	\$650,000	2.101	2.101
Anti-Kickback Procedures	\$150,000	\$200,000	3.502-2(i) 3.502-3 3.804 3.808(a) and (b) 52.212-3(e) 52.204-8(c)(1)(ii)	3.502-2(i) 3.502-3 3.804 3.808(a) 3.808(b)

Consolidated List – All threshold increases [Threshold Changes - October 1st, 2025, Acquisition.GOV](#)

Your Role in the New Process

- **Be Specific and Outcome-Focused:** Clearly define the problem you are trying to solve and the outcomes you need.
- **Engage in Market Research:** Share information about commercial products or services you think could meet your needs.
- **Participate in Demos and Pilots:** Your feedback is crucial for selecting the right tools.
- **Provide Timely and Clear Feedback:** Your subject matter expertise is the most important factor in ensuring we acquire the right capabilities.

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Thank You!



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