



## OFFICE OF FINANCE AND ADMINISTRATION

WASHINGTON, D.C. 20460

### MEMORANDUM

**SUBJECT:** Environmental Protection Agency (EPA) Interim Policy Notice (IPN) 25-35, Federal Acquisition Regulation (FAR) Class Deviation, RFO-2025-45, for FAR Part 45 in Support of Executive Order 14275 on Restoring Common Sense to Federal Procurement

**FROM:** Stefan Martiyan  
EPA Senior Procurement Executive  
Office of the Chief Procurement Officer

**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 45.

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 45, Government Property, has been retained with minimal deletions and minor updates made for plain language. No changes were made to provisions or clauses. The FAR Companion includes additional guidance and best practices to support this FAR part.

Statutory requirements retained in the RFO FAR part 45 model deviation include, but may not be limited to, the following:

- 40 U.S.C. § 503, Exchange or Sale of Similar Items
- 40 U.S.C. § 524, Duties of Executive Agencies
- 40 U.S.C. § 546, Contractor Inventories

4. Instructions. The EPA acquisition workforce must follow the RFO Part 45 model deviation text instead of FAR Part 45 as codified at 48 CFR Chapter 1. The Council's RFO Part 45 model deviation text is available at [Acquisition.gov/far-overhaul](https://www.acquisition.gov/far-overhaul) and is incorporated into this class deviation. EPA's Acquisition policy and regulations will be revised to reflect any necessary EPAAP or EPAAR changes that may be impacted by this FAR deviation.

Also,

- Do not include any of the removed provisions or clauses in future solicitations and contracts.
- For open solicitations or awarded contracts, the contracting officer has discretion regarding the need to enforce or amend the provisions or clauses. However, if removed provisions or clauses remain in the open solicitations or awarded contracts, the contracting officer may be required to separately address certain aspects in the contract.

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).