

UNITED STATES GOVERNMENT
National Labor Relations Board



Memorandum

July 20, 2026

TO: ACQUISITIONS MANAGEMENT BRANCH PERSONNEL

FROM: Isabel Luengo McConnell, Procurement Executive
National Labor Relations Board

A handwritten signature in black ink, appearing to read "Isabel Luengo McConnell", is written over the printed name.

SUBJECT: Federal Acquisition Regulation (FAR) Class Deviation for FAR Part 24 in Support of Executive Order 14275 on Restoring Common Sense to Federal Procurement

1. **Effective Date:** Immediately
2. **Expiration Date:** This Class Deviation remains in effect until the changes described herein are incorporated in the FAR, superseded, or otherwise rescinded.
3. **Purpose:** This memorandum approves a class deviation to FAR Part 24 for purposes of implementing the FAR Council's model deviation text to FAR Part 24.
4. **Authority:** This class deviation is issued under the authority of Executive Order (*E.O.*) 14275, *OMB M-25- 25*, and 48 CFR Subpart 1.4.
5. **Background:** On April 15, 2025, *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- Remove duplicative or outdated language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 the 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.

- 6. Summary of Changes:** FAR Part 24, Protection of Privacy and Freedom of Information, has been retained with minimal deletions and minor updates made for plain language. No changes were made to provisions or clauses.

The only change of note is section 24.301 is deleted. This section outlined requirements for contractors to provide their employees with privacy training. The content is duplicative as it is already covered in clause 52.224-3.

Statutory requirements retained in the RFO FAR Part 24 model deviation include, but are not limited to, the following:

- 5 U.S.C. § 552, as amended, Freedom of Information Act
- 5 U.S.C. § 552a (Pub. L. 93-579), Privacy Act of 1974
- 5 U.S.C. § 574, Confidentiality
- 10 U.S.C. § 3309 and 41 U.S.C. § 4702, Prohibition on Release of Contractor Proposals
- 10 U.S.C. § 3705 and 41 U.S.C. § 3505, Submission of Other Information
- OMB Circular No. A-130, Managing Information as a Strategic Resource.

- 7. Instructions:** National Labor Relations Board (NLRB) acquisition workforce shall follow the RFO Part 24 model deviation text instead of FAR Part 24 as codified at 48 CFR Chapter 1. The FAR Council's RFO Part 24 model deviation text is available at *Acquisition.gov*, under the "[FAR Overhaul](#)" link.
- 8. Applicability:** This deviation applies to all NLRB solicitations and new contracts as of July 13, 2026. This deviation does not apply to contracts signed and executed on or before July 13, 2026.
- 9. Point of Contact:** Questions or comments on this class deviation may be directed to Delfina St. Clair, Director, Acquisitions Management Branch, at Delfina.St.Clair@nlrb.gov.