

UNITED STATES GOVERNMENT  
National Labor Relations Board



# Memorandum

September 22, 2026

TO: ACQUISITIONS MANAGEMENT BRANCH PERSONNEL

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

SUBJECT: Federal Acquisition Regulation (FAR) Class Deviation for FAR Part 45 in Support of Executive Order 14275 on Restoring Common Sense to Federal Procurement

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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Date:** This Class Deviation remains in effect until the changes described herein are incorporated in the FAR, superseded, or otherwise rescinded.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 45 for purposes of implementing the FAR Council's model deviation text to FAR Part 45.
  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- Remove duplicative or outdated language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 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 and government directives 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.

- 7. Instructions:** National Labor Relations Board (NLRB) acquisition workforce shall follow the RFO Part 45 model deviation text instead of FAR Part 45 as codified at 48 CFR Chapter 1. The FAR Council's RFO Part 45 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 September 4, 2026. This deviation does not apply to contracts signed and executed on or before September 4, 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](mailto:Delfina.St.Clair@nlrb.gov).