



NATIONAL SCIENCE FOUNDATION
2415 Eisenhower Avenue ▪ Alexandria, VA 22314

July 23, 2025

MEMORANDUM

TO: National Science Foundation, Division of Acquisition and Cooperative Support (DACS)
National Science Foundation Acquisition Workforce

FROM: Patrick K. Breen
Senior Procurement Executive

SUBJECT: FAR Class Deviation for FAR Part 31 in Support of Executive Order 14275 on Restoring Common Sense to Federal Procurement

PURPOSE: This memorandum approves a class deviation to Federal Acquisition Regulation (FAR) part 31 for purposes of implementing the Federal Acquisition Regulatory Council's (the Council's) model deviation text to FAR Part 31.

BACKGROUND: On April 15, 2025, the [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- Remove duplicative or outdated language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
- 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 focus on core procurement requirements.

1. SUMMARY OF CHANGES: FAR part 31, Contract Cost Principles and Procedures, anchored in federal appropriations law, has been streamlined to provide only

the essential requirements for the pricing of contracts, subcontracts, and modifications whenever cost analysis is performed.

Statutory requirements retained in the RFO FAR part 31 model deviation include, but are not limited to, the following:

- Armed Services Procurement Act of 1947, Public Law 413
- 41 U.S.C. Chapter 43 and 10 U.S.C. Chapter 273, Allowable Costs
- 31 U.S.C. Chapter 37, Subchapter III, Claims Against the United States Government
- 18 U.S.C. § 1031, Major Fraud Against the United States
- OMB Circular A-122, Cost Principles for Nonprofit Organizations
- OMB Circular A-21, Cost Principles for Educational Institutions
- OMB Circular A-87, Cost Principles for State, Local, and Indian Tribal Governments

Change	Description
Retained	<ul style="list-style-type: none">• The majority of the content is retained as it implements appropriations law.• Most definitions and procedures are retained to maintain uniformity across Government.
Removed	<ul style="list-style-type: none">• Plain language edits were made throughout to enhance readability and remove redundant, unclear, or non-essential language, decreasing the word count by more than 1,300 words.

This table is not an exhaustive list.

INSTRUCTIONS: The NSF acquisition workforce shall follow the RFO part 31 model deviation text instead of FAR part 31 as codified at 48 CFR Chapter 1. The Council's RFO part 31 model deviation text is available at [Acquisition.gov/far-overhaul](https://www.acquisition.gov/far-overhaul), and is incorporated into this class deviation.

Review templates and related standard operating procedures to remove unnecessary process steps.

APPLICABILITY: This class deviation applies to all NSF procurement actions.

REQUIRED ACTIONS: The NSF acquisition workforce shall follow the RFO part 31 model deviation text instead of FAR part 31 as codified at 48 CFR Chapter 1. The Council's RFO part

31 model deviation text is available at [Acquisition.gov/far-overhaul](https://www.acquisition.gov/far-overhaul) and is incorporated into this class deviation.

This class deviation is issued under the authority of EO 14275, [OMB Memo M-25-26](#), 48 CFR 1.4, and RFO FAR 1.304.

EFFECTIVE DATE: This deviation is effective as dated and shall remain in effect until it is incorporated into the FAR, or until this class deviation is rescinded, extended, or amended.

POINT OF CONTACT: Contact Raymond McCollum at 703-292-4225 or rmccollu@nsf.gov.