



Office of Government-wide Policy

RFO Industry Webinar

September 10, 2025

1:00 - 3:30 p.m.



Welcome and General RFO Updates

Michael Thompson

EO 14275: *Restoring Common Sense to Federal Procurement*

- The EO says to rewrite the FAR by
 - Removing non-statutory requirements and making similar changes to agency supplements.
 - Retaining the best material in the FAR.
 - Making the changes now and implementing via deviations.
- As of September 4, 2025, the FAR Council has published rewrites for 31 FAR parts.

Strategic Acquisition Guidance (SAG)

Regulatory

Streamlined
FAR

Agency
Regulations

Non-Regulatory

FAR Companion

Category
Management
Buying
Guide



Practitioner
Albums



Learning assets to
help the acquisition
community navigate
the SAG during the
change journey.

Why have another webinar now?

- As you likely noticed, a large tranche of overhauled FAR parts were posted on August 14, 2025—Parts 4, 8, 12, 38, 40, 51.
- All of these parts touch commercial item buying.
- At GSA, these deviations will be effective on November 3, 2025.

Agenda

1. Welcome and General RFO Updates
2. Commercial Items – Changes, Practitioner Resources, Q&A
 - a. RFO Part 4
 - b. RFO Part 8
 - i. FSS Ordering Procedures
 - c. RFO Part 12
 - d. RFO Part 40
3. Summary
4. Closing Remarks

FAR Part 4 Overview

James Tsujimoto & Monica Taylor

FAR Part 4 – Administrative and Information Matters

- Subparts reorganized to follow the acquisition process.
- Reduces SAM registration requirements.
 - Makes it easier for industry to navigate and register.
 - Reduces GSA costs to operate the system.
- Reduces 13 provisions and clauses down to 7.
- Restructures to follow one of two paths:
 - SAM Registration Required
 - No Registration Required

FAR Part 4 – Change Summary

(Non-Comprehensive)

What is New?

- Explicitly allowing digital signatures
- Streamlined language throughout
- Consolidated provisions and clauses
 - 6 provisions covering SAM registration now simplified to 2 provisions
 - 2 clauses related to SAM maintenance updated

What was Moved?

- Part 40 - Security-related subparts, provisions and clauses
- FAR Companion - Recommendations and best practices for contract files
- Several subparts have moved within Part 4
 - Contract Reporting,
 - PIV Card Return,
 - Service Contract Inventory,
 - Executive Compensation*

What was Removed?

- Subpart 4.2 - Removed procedures on paper copy distributions
- Two provisions and clauses
 - 52.204-1, Approval of Contract
 - 52.204-22, Alternative Line Item Proposal

FAR Part 4 – Administrative and Information Matters

FAR Companion

- **FC4.101 Contents of contract files.** Contract files serve as the official repository for all documents related to an acquisition, ensuring regulatory compliance, supporting audit requirements and providing a complete administration record of acquisition activities from presolicitation through contract closeout. **Contract files should be complete yet tailored to the specific acquisition.** Each office with responsibilities for a contract should establish procedures to ensure timely filing of required documents and maintain appropriate cross-references between files when documents are maintained in different locations (e.g., different shared drives or electronic contract filing systems). ...
- **FC4.308 Low-risk contract closeout.** A large contract closeout backlog not only poses a significant burden to various acquisition and financial systems but also impedes an agency's ability to effectively manage its annual financial statement audit.

The quick-closeout procedure in FAR 42.507 provides relief for certain cost-type contracts involving indirect rates, but not for other contract types. To supplement this, at least **one agency has promulgated rules to use low-risk closeout procedures for specific types of expired contracts to streamline the closeout process,** reducing the backlog of open contracts with unliquidated funds or undelivered orders. Key aspects of low-risk closeout procedures included: ...



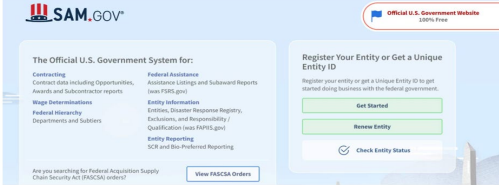
**Empowerment
and Flexibility**

FAR Part 4 – Administrative and Information Matters

Practitioner Album

- Smart Accelerators
 - What, How, Impact, Use Cases, Resources, etc.
- RFO Impacts on SAM.gov

RFO Impacts on SAM.GOV



The Official U.S. Government System for:

- Contracting: Contract Data Including Opportunities, Awards and Subcontractor reports
- Entity Information: Entity, Disaster Response Registry, Exclusions, and Responsibility (Qualification) (see FARPS.gov)
- Entity Reporting: SCE and Dis-Preferred Reporting
- Federal Assistance: Assistance Listings and Subaward Reports (see FAMS.gov)

Register Your Entity or Get a Unique Entity ID

Register your entity or get a Unique Entity ID to get started doing business with the federal government.

[Get Started](#)

[Renew Entity](#)

[Check Entity Status](#)

Are you searching for Federal Acquisition Supply Chain Security Act (FSCSA) orders? [View FSCSA Orders](#)

What impacts is the RFO having on SAM.GOV?

The Revolutionary FAR Overhaul (RFO) is streamlining the FAR to its statutory roots and to policies necessary to support sound procurement. The effort will result in changes to

Track 4 of 5

Bulk Contract Closeouts - Smart Strategies for Faster Contract Closeouts



Traditional closeout procedures can be an administrative burden when you're faced with a backlog of contract closeouts. A risk-based approach can streamline and speed up a contract closeout.

Address critical challenges and operational bottlenecks by aligning closeout procedures to the complexity of the requirement. Low-risk contract closeout can be fast tracked to alleviate a large backlog of expired contracts.

START >



Smart Accelerators

Track 3 of 5

Adapting Quickly and Responding Effectively - Maximizing Your Contract File



While the contents of a contract file are not statutorily derived, how we maintain our contract file is driven by our commitment to transparency and best practices. Adequate contract file management is essential for ensuring transparency and accountability in the expenditure of American taxpayer funds.

The contract file serves as the official repository for all acquisition documents from start to finish. An adequate contract file ensures we have a record of the government's purchasing and sound decision-making.

START >

Practitioner Album Tracks

FAR Part 4

Change Summary ✓

Line-Out ✓

Smart Accelerators

RFO Impacts on [SAM.gov](#)

AWF CLPs & Community

FAR Part 4 – Q&A

FAR Part 8 Overview

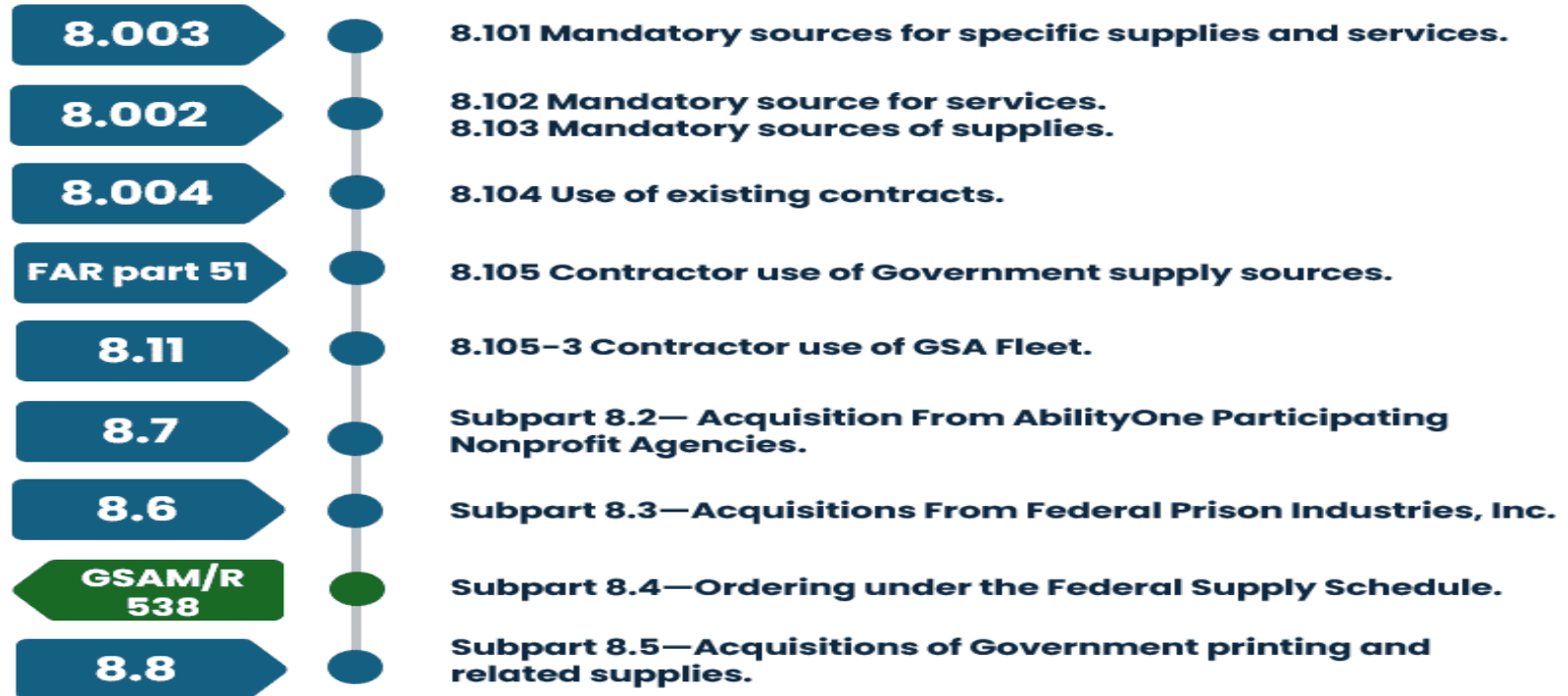
Lanelle Walcott, Stephen Carroll & Monica Taylor

FAR Part 8 – Required Sources of Supplies and Services

Summary of Revolutionary Changes

1. Restructured framework
2. Permits contractors to use **Gov't Sources** as part of providing a solution to an agency requirement for any contract type
3. New tier of contract called “required use” (none currently designated)
4. Moves Federal Supply Schedule ordering procedures to the GSAR (discussed later)

FAR Part 8 – Required Sources of Supplies and Services Restructured Framework



FAR Part 8 – Required Sources of Supplies and Services Restructured Framework Cont'd

Restructured Framework

- Subpart details presented in cadence with the acquisition lifecycle
 - Easy to Find & Where you Need It
- Removed: duplicative info, specific prescriptive instructions, outdated info
- Return to statutory foundation
- Streamlined appearance, ease of use



FAR Part 8 – Required Sources of Supplies and Services

Mandatory Sources

8.102 Mandatory source **for services**

- Priority of order - **unchanged**
- **AbilityOne Procurement List** is mandatory, if available

Exceptions

Required by law or mandated under 8.101

8.103 Mandatory sources **of supplies**

- Priority of order - **modified**
 - AbilityOne remains 4th in priority
 - General Supplies & Services (GSS) ***removed***

Exceptions

Required by law or mandated under 8.101

FAR Part 8 – Required Sources of Supplies and Services

Existing Contracts

Tier 4: “Required Use” Contracts “NEW”
None Currently Designated

Tier 3: Best-in-Class (BIC) Contracts


Tier 2: Multi-Agency GWACs, IDIQ


***Tier 1 - Agency Managed; Data Analysis/Sharing Features**


***Tier 0 - Largely Decentralized**

****Agencies encouraged to move up tiers***

FAR Part 8 – Required Sources of Supplies and Services Correction

 An official website of the United States Government

 **ACQUISITION.GOV**

[FAR Overhaul](#) [Regulations ▾](#) [Tools ▾](#) [Policy Network ▾](#) 

[Agency Deviations \(1\)](#) ▾

Part 8 - Required Sources of Supplies and Services

NEW - Federal Supply Schedule Ordering Procedures

[Agency Deviations \(6\)](#) ▾

Issuance Date: August 14, 2025
UPDATE: August 29, 2025

Part 9 - Contractor Qualifications

[Agency Deviations \(3\)](#) ▾

Issuance Date: August 21, 2025

Part 10 - Market Research

[Agency Deviations \(30\)](#) ▾

Issuance Date: May 22, 2025

changes to Executive Orders or statute will be reflected when the Revolutionary FAR Overhaul turns to rule-making.

FAR Part 8 – Required Sources of Supplies and Services

AbilityOne Program



FAR 8.2 **AbilityOne Program**

- Authorized under JWOD Act
- Procurement List (PL) for Services & Supplies
- Commission sets price, authorizes additions/deletions to PL

✓ FAR 8 Changes

- Introduced a “Required Use” Tier, Designations TBD
- AbilityOne prioritized before other commercial sources, if avail
- Ordering streamlined with lifecycle flow



Industry Impact

- Agencies must check PL first
- AB1 Waiver required to bypass
- Opportunities to partner with NPAs (Nonprofit Agencies)



Key Takeaways

- Mandatory source unless waiver
- Supports federal socioeconomic goals
- Competitive advantage by teaming with AbilityOne partners

FAR Part 8 – FSS Ordering Procedures

New location for the Federal Supply Schedule Ordering Procedures.

1

How we streamlined the procedures.

2

Key enhancements that will transform how we all work together.

3

FAR Part 8 (cont) – FSS Ordering Procedures

- Streamlined ordering procedures for the Federal Supply Schedules are relocated from FAR part 8 to the General Services Acquisition Regulation (GSAR)
- RFO 8.401(b) instructs agencies to follow the ordering procedures established by GSA at **GSAR 538.71**
- The move:
 - Drives iterative modernization
 - Removes barriers
 - Balances efficiency with oversight

FAR Part 8 (cont) – FSS Ordering Procedures

- Previous FAR 8.4 contained approx. 10,000 words. GSAR 538.71 is now closer to 2,400 words.
- This reduction:
 - Simplifies the ordering process
 - Enhances competition
 - Creates efficiencies
- The new procedures cut out unnecessary complexity and promotes a simpler, more innovative ordering process.

FAR Part 8 (cont) – FSS Ordering Procedures

- Key enhancements introduced:
 - Emphases on innovation
 - Clarifies FAR part 15 process does not apply
 - Embraces “best value”
 - Clarifies FSS Contractor Team Arrangements (CTA) are authorized
 - Eliminates duplicative procedures based on SOWs
 - Maintains SOW concept, while including PWS, SOO
 - Procedures now organized by dollar thresholds
 - Eliminates restrictions on single-award BPAs over \$100M
 - Standardizes the process for obtaining items not priced on FSS contracts
 - Increases contractor access to Government Supply Sources

FAR Part 8 (cont) – FSS Ordering Procedures

- Key features retained (but revised, simplified, or modernized):
 - Small business discretion
 - Seeking at least three quotes (above MPT)
 - Sole-source justification requirements
 - Items peculiar to one manufacturer
 - Disputes

FAR Part 8 – Required Sources of Supplies and Services

FAR Companion



- **FC8.401 Periodic Table of Acquisition Innovations (PTAI) procedures for FAR part 8 RFQ streamlining.**
The PTAI provides targeted support for streamlining FAR part 8 ordering procedures by offering proven innovative approaches that agencies can adopt and adapt to their procurements. PTAI evaluation methodologies can be directly applied to Request for Quotation (RFQ) processes when placing orders under Federal Supply Schedule contracts or governmentwide acquisition contracts established by category management. ... Three flexible procedures that a contracting officer can use specific to the RFQ process are highlighted below. See the PTAI for additional information and additional approaches.
 - **Phased down-select processes.** Consider multi-phase evaluation processes that progressively narrow the competitive field through increasingly detailed assessments. ... This approach reduces the proposal preparation burden for industry while allowing agencies to focus evaluation resources on the most promising solutions. ...
- **FC8.401(b) Contents of a brief explanation.**
In accordance with the FSS ordering procedures, if an unsuccessful quoter requests information on an award within 3 days after the notification of contract award, provide a brief explanation of the award decision ... The brief explanation may include the following information:
 - The number of quotations received;
 - The name of each quoter receiving an award;
 - The total order price; and
 - In general terms, the reason(s) the quoter's quotation was not selected, unless the price information shared readily reveals the reason. ...

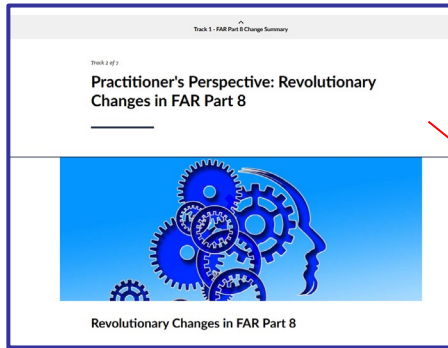
FAR Part 8 – Required Sources of Supplies and Services

Practitioner Album

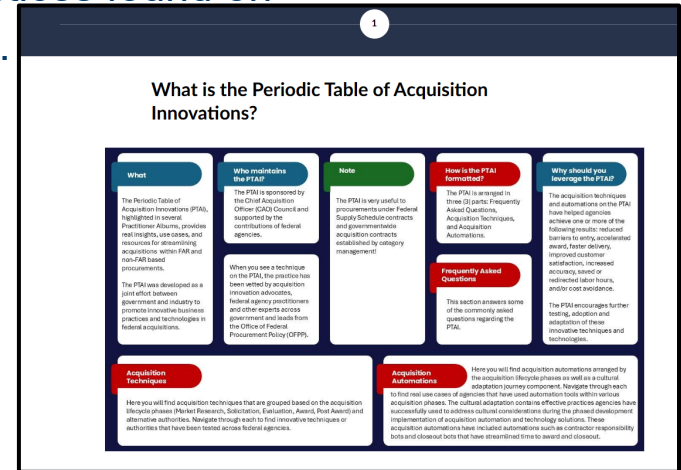
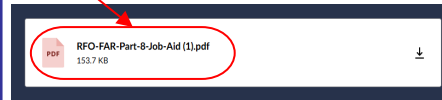
- Practitioner's Perspective & Job Aid
 - For example: Innovative RFQ Approaches (RFO GSAM 538.7102-2(a)) - Agencies are encouraged to utilize innovative Request for Quotation (RFQ) practices found on the Periodic Table of Acquisition Innovations.

Practitioner Album Tracks

FAR Part 8
Change Summaries ✓
Line-Outs ✓ (8, 38, 51)
Practitioner's Perspective
Smart Accelerators
AWF CLPs & Community



Track 2 of 7



Track 6 of 7

FAR Part 8 – Q&A

FAR Part 38 & FAR Part 51

- **FAR Part 38**, *Federal Supply Schedule Contracting*
 - Removed in its entirety.
 - Guidance & procedures for Schedule program moved to GSAR Part 538.
- **FAR Part 51**, *Use of Government Sources By Contractors*
 - Removed in its entirety.
 - All statutory text & essential text retained to support sound procurement moved to FAR Part 8.

FAR Part 12 Overview

Christopher Hardcastle & Monica Taylor

FAR Part 12 – Acquisition of Commercial Products & Commercial Services

- Overhauled FAR 12 now contains stand alone procedures
 - Simplified procedures for commercial actions up to \$7.5M (previously FAR 13)
 - Supports commercial procedures for construction requirements
 - Maintains preference for fixed-price commercial contracts

FAR Part 12 – Acquisition of Commercial Products & Commercial Services

- ~30% reduction in the total number of commercial provisions & clauses
 - Fewer reporting requirements
 - Fewer clauses that flow down to subcontractors
 - Eliminates legacy provision 52.212-3 and legacy clause 52.212-5

FAR Part 12 – Change Summary

Evaluation Procedures

- RFQ/quote emphasis
 - comparative evaluation encouraged
 - no scoring/rating requirements
 - broad discretion allowed for evaluation schemes

Timely Quote / Offer Submission

- RFO 52.212-1
 - Allows the government to consider “late” offers / quotes
 - Must be received prior to award, and subject to CO determination

Postaward Notification

- For simplified actions, a brief explanation will be provided upon request
 - Will include information contained in an award notice

FAR Part 12 – Acquisition of Commercial Products & Commercial Services

FAR Companion

- **FC12.000, 2.101 Understanding commercial products and services.**

When evaluating whether a product qualifies as commercial, acquisition professionals can focus on the extent of modifications required to meet government needs. The critical distinction lies between minor modifications and major customization.

- Minor modifications to products typically qualify as commercial when changes don't significantly alter how the item normally functions or its essential characteristics outside of government use.
- Major customization to products typically eliminates commercial status when substantial changes fundamentally alter core functionality or essential characteristics.
- Scope and value considerations include evaluating modifications relative to the overall product. Dollar amounts and percentages can serve as helpful guides, though they're not the only determining factors.
- For services, consider examining whether pricing reflects true commercial practices by checking if prices represent genuine market rates—those established through normal business transactions between willing buyers and sellers, supported by competition or independent sources—rather than just the vendor's claims.

The objective is to ensure that what the government is buying truly reflects what's available in the commercial marketplace under similar terms and conditions.

*Periodic Table of
Acquisition
Innovations*

*Modular
acquisition
strategies*

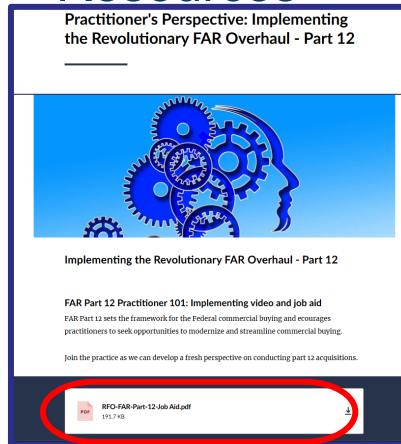
BPA's

*Strategic management of
award notice, debriefing, and
protest window.*

FAR Part 12 – Acquisition of Commercial Products & Commercial Services

Practitioner Album

- Practitioner's Perspective Video and Job Aid
- Commercial Buying
 - Smart Accelerators
 - Resources



Track 3 of 5

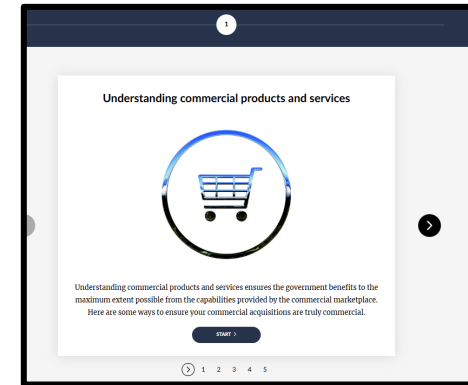


Track 3 of 5

One-stop
shop for all
commercial
simplified
procedures!

Practitioner Album Tracks

	FAR Part 12 Change Summary ✓ Line-Out ✓ Practitioner's Perspective Smart Accelerators AWF CLPs & Community
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Track 4 of 5

FAR Part 12 – Q&A

FAR Part 40 Overview

Kevin Funk & Monica Taylor

FAR Part 40 – Information Security and Supply Chain Security

- Consolidates prohibitions in multiple FAR Parts to single "do not buy" list.
- Simplified: reorganized into three key subparts:
 - Subpart 40.1 - Processing Supply Chain Risk Information (previously reserved)
 - Subpart 40.2 - Security Prohibitions and Exclusions ("do not buy" list)
 - Subpart 40.3 - Safeguarding Information (previously reserved)
 - Classified Information
 - Federal contract information
- Facilitates integration of new national security prohibitions
 - Such as semiconductor prohibition in FY 2023 National Defense Authorization Act (in the future, FAR Council will add prohibition to FAR 40)

FAR Part 40 – Information Security and Supply Chain Security

Removed

- Streamlined by removing redundancies, and improving clarity

Consolidated Requirements

- Moved security requirements previously found at:
 - FAR subparts 4.4, 4.19 through 4.23
 - FAR subpart 25.7
- 14 separate provisions and clauses have been merged into 4

Standardized Requirements Across Prohibitions

- Reasonable inquiry standard
- Reporting elements and timeframe

FAR Part 40 – Change Summary

Consolidates Requirements

- Consolidates prohibitions to single "do not buy" list
- Reorganized into three key subparts
- Facilitates integration of new national security prohibitions

Standardizes Security Across Prohibitions

- Reasonable inquiry standard
- Reporting elements
- Reporting timeframe

Improves National Security

- Improved implementation
 - Simplified guidance
 - Standardized requirements
- Improved reporting
 - Validation time
 - Standardized elements

FAR Part 40 – Information Security and Supply Chain Security

FAR Companion

FC40.1 Integrate security throughout the acquisition lifecycle.

...

A cross-functional acquisition team composition, with roles such as those detailed in the table, ensures comprehensive security expertise throughout the acquisition lifecycle for protecting sensitive information and implementing security prohibitions and exclusions. ...



Role/Position	Subject Matter Expertise	Key Contributions
Chief Information Security Officers (CISOs) or Representatives	Cybersecurity	Bring cybersecurity expertise to requirement development and proposal evaluation
Supply Chain Specialists	Logistics and Industrial Security	Offer insights on manufacturing risks and component authenticity verification methods
Legal Counsel	Regulations, Export Controls, Foreign Ownership	Help navigate complex regulatory landscapes with expertise in export controls and foreign ownership restrictions
End Users	Operations	Contribute practical perspectives on security usability
IT Technical Evaluators	Hardware Engineering	Assess hardware tampering vulnerabilities
Program Managers	Program Portfolio	Help ensure interoperability with existing security architecture

FAR Part 40 – Information Security and Supply Chain Security

Practitioner Album

- Smart Accelerators
 - Integrating Information for Security and Supply Chain Security throughout the Acquisition Lifecycle
 - Resources

Practitioner Album Tracks

FAR Part 40

Change Summary ✓

Line-Out ✓

Smart Accelerators
AWF CLPs & Community

Integrating Information for Security and Supply Chain Security throughout the Acquisition Lifecycle



From a strategic perspective, incorporate comprehensive security expertise throughout the acquisition lifecycle.


START >

Track 3 of 4

Resources 1

HOW GSA CAN HELP CYBERSECURITY SUPPLY CHAIN RISK MANAGEMENT

Cybersecurity Supply Chain Risk Management (C-SCRM) How GSA Can Help



Watch on YouTube

< 1 2 3 4 5 6 7 >

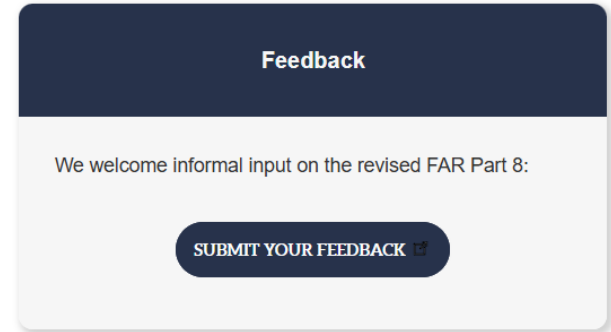
Track 3 of 4

FAR Part 40 – Q&A

Updates & Summary

Jeff Koses

Listening to your feedback



- 45 day feedback period per deviation - on the RFO Page on Acquisition.gov.
- Executive Summary and raw comments shared with FAR Council and OFPP.
- Key Feedback Themes:
 - Missing or incorrect citations
 - Restore deleted text
 - Concerns about small business

Small business issues

- Concerns of negative impact.
- Reducing duplication doesn't remove requirements.
- Beneficial changes.
- FAR Council working with SBA on FAR Part 19.

Workforce and industry readiness

- Changes at an unprecedented pace.
- Resources, information, and guidance all posted on [Acquisition.gov](https://www.acquisition.gov).
- GSA training its workforce.
- FAI - DAU partnership.
- Industry communications.

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Office of the Procurement Ombudsman

Organization

- Overview
- Office of the Administrator
- Leadership directory
- Federal Acquisition Service
- Public Buildings Service
- Office of the Chief Information Officer
- Office of Government-wide Policy**

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Who we serve

Contractors, prospective contractors, and individuals with concerns about GSA procurement actions, policies and practices.

What we do

The Office of the Procurement Ombudsman (OPO) provides an informal forum for vendors and industry associations who do business with GSA to voice their concerns with our acquisition programs, policies and practices. We collaborate with internal and external stakeholders to resolve differences and reduce the likelihood of formal disputes, protests and lawsuits. The ombudsman functions as an impartial and critical entity that

[FAR News](#) for all things Acquisition.gov.

“Stay in touch” on the [GSA Ombudsman webpage](#).

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Office of Acquisition Policy

- Governmentwide Acq Policy
- Federal Acquisition Policy Division
- Regulatory Secretariat Division**
- Regulatory Information Service Center

Assists with FAR related [Freedom of Information Act \(FOIA\)](#) requests.

Additional publications for the Federal Register are processed throughout GSA. These include:

- [General Services Acquisition Regulation/Manual \(GSAR/GSAM\)](#)
- [Federal Travel Regulation \(FTR\)](#)
- [Federal Management Regulation \(FMR\)](#)
- [Federal Property Management Regulation \(FPMR\)](#)

On a semi-annual basis, the Regulatory Secretariat manages the Unified Agenda for GSA and supports the FAR. These reports inform the public of upcoming rules that are planned in the next 12 months. The Regulatory Secretariat Division also manages the [Paperwork Reduction Act \(PRA\) program](#) for the GSA Chief Information Officer's CIO's office. Per 44 U.S. Code § 3506, the CIO is responsible for information collections, which consist of paper and web media and are used to collect information from the public. The Regulatory Secretariat Division ensures all information collections are published in the Federal Register, public comments are sought, and the requests are submitted to OMB for approval.

Get updates

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- Get help with your GSA procurement

Future updates

- Goal - keep supplemental deviations to a minimum.
- Some updates will be necessary.
- Will carry the tag **UPDATE: [Date]** in the RFO page

Acqu

The screenshot shows the ACQUISITION.GOV website. The header includes the site name and navigation links for FAR Overhaul, Regulations, Tools, and Policy Network. A search icon is also present. Below the header, there is a list of FAR Overhaul parts, each with a title, a description, and an issuance date. The first part, 'Part 8 - Required Sources of Supplies and Services', has an issuance date of August 14, 2025, and a red 'UPDATE: August 29, 2025' tag. The other parts listed are 'Part 9 - Contractor Qualifications' (August 21, 2025) and 'Part 10 - Market Research' (May 22, 2025). Each part also has a link to 'Agency Deviations'.

Part	Issuance Date	Update Date
Part 8 - Required Sources of Supplies and Services	August 14, 2025	UPDATE: August 29, 2025
Part 9 - Contractor Qualifications	August 21, 2025	
Part 10 - Market Research	May 22, 2025	

Next steps

- EO 14275 gave the FAR Council 180 days to update the FAR through deviation.
- Assess, evaluate, and continue testing.
- Begin the rule-making process.



Closing Remarks

Michael Thompson

