

Publications

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Revolutionary FAR Overhaul: Part 8 Rewrite

Key Takeaways:

- FAR Part 8 has been revised as part of the FAR Council’s ongoing “Revolutionary FAR Overhaul,” with agencies implementing changes now via class deviations, with formal rulemaking to follow.
- The updated rules adopt a BIC-first sourcing policy and shift key ordering procedures for Federal Supply Schedule (FSS) contracts into the GSAM, streamlining acquisition steps but preserving core statutory requirements.
- Contractors should expect faster timelines for large BPAs and increased reliance on mature contract vehicles — but also greater pressure to team, subcontract or qualify for exceptions when not on a BIC contract.

As part of the FAR Council’s ongoing “Revolutionary FAR Overhaul” (RFO), the Council released model deviation text for FAR Part 8 (Required Sources of Supplies and Services) and invited informal feedback. Agencies are implementing the text through class deviations now, with formal rulemaking to follow. The General Services Administration’s (GSA) deviations take effect November 3, 2025, and the guidance directs ordering activities for Federal Supply Schedule (FSS) contracts to follow the new procedures in Subpart 538.71 of the GSA Acquisition Manual (GSAM).

For agencies, the updates reshape sourcing priorities, ordering procedures and internal approval paths. For contractors, they affect access — who can compete for work and under what conditions. Whether you’re managing procurement or pursuing federal opportunities, the revised Part 8 changes the map.

What’s Changed in Part 8

- **FSS ordering procedures moved to GSAM 538.71:** FAR 8.4 no longer houses the detailed mechanics for ordering from the Schedules; instead, it now points to GSAM Subpart 538.71 for the operative steps. GSA’s deviation highlights what remains (e.g., the requirement to seek at least three quotes above the micro-purchase threshold, brief award explanations, streamlined sole-source justifications) and what’s pared back (prescriptive, duplicative steps). The idea is fewer hoops, same statute.
- **BIC-first policy:** New Part 8 language requires agencies to use an existing Best-in-

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- Gregory S. Jacobs
- James W. Kim
- Cate Baskin
- Erin L. Felix
- Daniel H. Petkoff
- Olivia Velasco

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Class (BIC) contract or Blank Purchase Agreement (BPA) when a commercial product or service meets the need — unless the Head of the Contracting Activity (HCA) grants an exception (e.g., terms, scope or timing don't fit). If no suitable BIC exists, agencies are told to look at other GWACs/BPAs or shared services. In short: use the strongest roof already built.

- **Removed approval step for single-award BPAs over \$100M:** The familiar agency-head approval for single-award Schedules BPAs above \$100 million is expressly removed as a non-statutory requirement under GSA's class deviation. A determination is still required, but not an agency-head signoff.

Implications for Agencies and Contractors

At a high level, agencies are likely to get a cleaner and more efficient runway for acquiring commercial items and services: BIC first, where it fits, and a single GSAM-playbook for Schedules orders. Contractors, in turn, can expect shorter timelines for large BPAs without the \$100 million agency-head approval requirement. The tradeoff: a transition period with interagency differences until each organization updates SOPs, checklists and training.

A BIC-first policy may steer spending toward mature governmentwide contract vehicles, rewarding vendors already on them and encouraging teaming. But that same shift can make it harder for off-BIC contractors to win prime orders — unless they subcontract, team up or pursue opportunities where no BIC contract fits the agency's specific needs, potentially justifying an HCA exception.

Finally, moving prescriptive steps out of the FAR and into GSAM 538.71 removes clutter, but it does not relax statutory requirements. Contracting officers still need market research and fit-for-purpose justifications, and contractors should still expect scrutiny — just through a shorter checklist. File quality will likely matter even more, not less, because the rules are leaner and bid protests will test the boundaries of agency interpretation.

It will be critical to see how the revised FAR Part 8 is implemented, as consistent application is key to compliance and efficiency across all agencies. These changes will only succeed if everyone adopts them uniformly.

In a storm, a map helps — but only if everyone is using the same edition.