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Revolutionary FAR Overhaul (RFO) Update

This fifth installment of the *Contract Management* magazine coverage of the Revolutionary FAR Overhaul details changes in word count, readability, reduction in imperative language, and more.

By Don Mansfield, CFCM

In the fifth installment of our series covering the Revolutionary FAR Overhaul (RFO), we cover deviation guidance for FAR parts 3, 7, 13, 14, 17, 24, 27, 44, and 45. As part of our coverage, we provide document statistics to assess the changes in terms of word count, readability (using the Flesch-Kincaid scale), and reduction of imperative language. This article summarizes the changes for each part in the order they were issued and provides commentary on the changes.

FAR part 3: Improper Business Practices and Personal Conflicts of Interest

FAR part 3 prescribes policies and procedures for avoiding improper business practices and personal conflicts of interest and for dealing with their apparent or actual occurrence. Table 1 contains an analysis of the deviation guidance.

TABLE 1. FAR Part 3: Improper Business Practices and Personal Conflicts of Interest

Document Statistics:								
Word Count			Readability (Flesch-Kincaid)			Shalls/Musts		
Current	RFO	Net	Current	RFO	Net	Current	RFO	Net
17722	15005	-2717	16.5	16.1	-0.4	132	117	-15

Highlights:

- Most content retained with minimal deletions.
- Plain language rewrite of remaining content.

Bottom line: No changes to requirements except for removal of coverage of whistleblower protections under American Recovery and Reinvestment Act of 2009 and the associated clause at 52.203-15. Slight improvement in readability. Changes should not have any significant effect on the acquisition process.

FAR Part 7: Acquisition Planning

FAR part 7 prescribes policies and procedures for developing acquisition plans, determining contractor versus government performance (OMB Circular A-76), making lease-versus-purchase decisions, and determining whether functions are inherently governmental. Table 2 contains an analysis of the FAR part 7 deviation guidance.

TABLE 2. FAR Part 7: Acquisition Planning								
Document Statistics:								
Word Count			Readability (Flesch-Kincaid)			Shalls/Musts		
Current	RFO	Net	Current	RFO	Net	Current	RFO	Net
9509	4845	-4664	15.5	15.2	-0.3	65	32	-33

Highlights:

- Removal of prescriptive content for written acquisition plans.
- Emphasis on streamlined procedures for orders under existing contracts and acquisitions of commercial products and commercial services.
- Deletion of FAR subpart 7.3, Contractor Versus Government Performance, and associated clause and provisions.

Bottom line: Slimmed the part to about half of its original size. The removal of FAR subpart 7.3 was long overdue, as Congress has placed a hold on A-76 competitions since 2008. The relocation of prescriptive rules regarding the content and format of acquisition plans to the FAR Companion Guide is welcome. The most interesting addition was the “oral” acquisition plan (the deviation guidance states that a plan can be oral or written). In either case, there would need to be a record of the plan. This raises the question of how to create a record of an oral acquisition plan. I think an audio or video recording of someone explaining the plan would be sufficient. That would certainly streamline documentation.

FAR part 13: Simplified Acquisition Procedures

FAR part 13 prescribes policies and procedures for the acquisition of supplies and services, including construction, and research and development, the aggregate amount of which does not exceed the simplified acquisition threshold (SAT). Table 3 contains an analysis of the deviation guidance.

TABLE 3. FAR Part 13: Simplified Procedures for Noncommercial Acquisitions								
Document Statistics:								
Word Count			Readability (Flesch-Kincaid)			Shalls/Musts		
Current	RFO	Net	Current	RFO	Net	Current	RFO	Net
10883	921	-9962	15.1	13.9	-1.2	97	3	-94

Highlights:

- Part only applies to noncommercial acquisitions at or below the SAT.
- Express prohibition on using FAR part 12 provisions and clauses.

Bottom line: With the relocation of much of the original content to the FAR part 12 deviation guidance, the part has been reduced to slightly over three pages. The remaining content is organized in subparts by acquisition phase and rewritten in plainer language.

FAR part 14: Sealed Bidding

FAR part 14 prescribes the requirements of contracting for supplies and services (including construction) by sealed bidding and procedures for two-step sealed bidding. Table 4 contains an analysis of the deviation guidance.

TABLE 4. FAR Part 14: Sealed Bidding								
Document Statistics:								
Word Count			Readability (Flesch-Kincaid)			Shalls/Musts		
Current	RFO	Net	Current	RFO	Net	Current	RFO	Net
14917	10826	-4091	14.0	13.7	-0.3	257	127	-130

Highlights:

- Reorganized content by acquisition phase.
- Relocated guidance to FAR Companion.

Bottom line: Relocation of guidance to the FAR Companion primarily accounts for the reduction in word count. Given the decline in the use of sealed bidding since the 1980s, changes to FAR part 14 are unlikely to have any significant effect on the acquisition process. Many contracting professionals can go their entire career without having any practical experience with this contracting method (myself included).

FAR part 17: Special Contracting Methods

FAR part 17 prescribes policies and procedures for the acquisition of supplies and services through special contracting methods, including multi-year contracting, options, leader company contracting, and the use of reverse auctions to obtain competitive pricing. Table 5 contains an analysis of the deviation guidance.

TABLE 5. FAR Part 17: Special Contracting Methods								
Document Statistics:								
Word Count			Readability (Flesch-Kincaid)			Shalls/Musts		
Current	RFO	Net	Current	RFO	Net	Current	RFO	Net
10276	6337	-3939	15.4	14.4	-1.0	107	68	-39

Highlights:

- Reorganization of information within subparts.
- Combination of related topics and removal of redundant coverage.
- Movement of guidance to FAR Companion.
- Plain language rewrite.

Bottom line: The changes make the part more user-friendly in terms of organization and readability. Relocation of guidance to the FAR Companion slims down the part considerably. No significant changes expected in administrative burden borne by contracting officers, offerors, or contractors.

FAR Part 24: Protection of Privacy and Freedom of Information

FAR part 24 prescribes policies and procedures that apply requirements of the Privacy Act of 1974 and OMB Circular No. A-130, December 12, 1985, to government contracts and cites the Freedom of Information Act. Table 6 contains an analysis of the FAR part 24 deviation guidance.

TABLE 6. FAR Part 24: Protection of Privacy and Freedom of Information									
Document Statistics:									
Word Count			Readability (Flesch-Kincaid)			Shalls/Musts			
Current	RFO	Net	Current	RFO	Net	Current	RFO	Net	
1558	1098	-460	16.5	15.7	-0.8	13	10	-3	

Highlights:

- Guidance for processing FOIA requests removed.
- Plain language rewrite of remaining content.

Bottom line: One of the shortest parts in the FAR was reduced by about one-third. The plain language rewrite improved readability. Minimal impact on the acquisition process is expected.

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FAR part 27: Patents, Data, and Copyrights

FAR part 27 prescribes the policies, procedures, solicitation provisions, and contract clauses pertaining to patents, data, and copyrights. Table 7 contains an analysis of the deviation guidance.

TABLE 7. FAR Part 27: Patents, Data, and Copyrights

Document Statistics:

Word Count			Readability (Flesch-Kincaid)			Shalls/Musts		
Current	RFO	Net	Current	RFO	Net	Current	RFO	Net
16678	10678	-6000	16.9	16.7	-0.2	107	40	-67

Highlights:

- Removal of the clause at FAR 52.227-18, Rights in Data – Existing Works and grant of authority for agencies to specially negotiate license rights when acquiring existing works.
- Removal of procedures for acquiring rights in proposal data and corresponding clause at FAR 52.227-23, Rights to Proposal Data (Technical).
- Plain language rewrite.

Bottom line: FAR part 27 contains a fair amount of guidance, so relocating that coverage to the FAR Companion explains the reduction in word count. Although there was an attempt at rewriting the part in plain language, the results only produced negligible improvement. Despite the removal of the two FAR clauses cited in the Highlights (see above) and the grant of discretion to agencies to negotiate adequate data rights, we should not be surprised to see text like that of the FAR clauses in agency “homegrown” clauses. This is because *most contracting officers don’t know how to negotiate data rights*. If we are going to empower contracting officers to negotiate data rights, *we need to train them how to do it*.

FAR Part 44: Subcontracting Policies and Procedures

FAR part 44 prescribes policies and procedures for consent to subcontracts and advance notification of subcontracts, and for review, evaluation, and approval of contractors’ purchasing systems. Table 8 contains an analysis of the deviation guidance.

TABLE 8. FAR Part 44: Subcontracting Policies and Procedures

Document Statistics:

Word Count			Readability (Flesch-Kincaid)			Shalls/Musts		
Current	RFO	Net	Current	RFO	Net	Current	RFO	Net
3176	1691	-1485	15.9	16.5	0.6	29	16	-13

Highlights:

- Reorganized content by acquisition phase.
- Relocated guidance for evaluating contractor requests for consent to subcontract.
- Relocated guidance for contractor purchasing system review.

Bottom line: Relocation of guidance reduced content by about half. Slight decrease in readability. No significant changes to contracting officer-required actions nor clauses, so we shouldn’t expect much impact on the acquisition process. Curious placement of coverage for consent and advance notification of subcontracts under a new subpart titled “Evaluation and Award” – these are traditionally post-award actions.

FAR part 45: Government Property

FAR part 45 prescribes policies and procedures for providing government property to contractors; contractors’ management and use of government property; and reporting, redistributing, and disposing of contractor inventory. Table 9 contains an analysis of the deviation guidance.

TABLE 9. FAR Part 45: Government Property								
Document Statistics:								
Word Count			Readability (Flesch-Kincaid)			Shalls/Musts		
Current	RFO	Net	Current	RFO	Net	Current	RFO	Net
5904	5595	-309	16.2	16.1	-0.1	68	65	-3

Highlights:

- Plain language rewrite.

Bottom line: A few paragraphs moved to the FAR Companion. Plain language rewrite that consisted mostly of changing “shall” to “must.” Nothing revolutionary.

Conclusion

The RFO website states that the initiative will “remove most non-statutory rules.” The only nonstatutory rules that were supposed to remain would be those that were “essential to sound procurement.” That hasn’t been the case; several parts have been

nothing more than plain language rewrites. Perhaps the aggressive deadline has not allowed for adequate deliberation about what nonstatutory rules are really necessary, so most nonstatutory rules were assumed to be essential to sound procurement. **CM**

Don Mansfield is a consultant, trainer, writer, and speaker in federal contracting. He has over 30 years of experience working in the Department of Defense and industry. He is the owner of Don Acquisition LLC. Line-in line-out documents showing changes to the FAR based on the deviation guidance are available on his website at www.donacquisition.com.



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COUNSEL COMMENTARY

The FAR Part 19 Overhaul

The updated *FAR* includes new acquisition rules that will have profound impacts on small business set-aside contracting.

BY STEPHEN L. BACON



Earlier this year, the Federal Acquisition Regulation (FAR) Council issued the much-anticipated update to FAR Part 19 in conjunction with the Revolutionary FAR Overhaul (RFO). The updated FAR Part 19 establishes new regulations governing small business set-aside acquisitions, including several notable changes.

The most significant revisions relate to the “Rule of Two,” the recertification rules related to task and delivery orders under multiple-award contracts, and competition requirements for contracts awarded under the Small Business Administration (SBA) 8(a) Business Development Program. The changes represent a mixed bag for small business government contractors.

Although some changes will increase opportunities for small businesses, other changes are likely to reduce the number of set-aside procurements. The updated *FAR* also introduces substantial uncertainty for small businesses in several key areas where the new *FAR* regulations are not aligned with current SBA regulations, which have not yet been revised.

Government contractors need to understand the new rules of the road for small-business set-aside procurements,

where the risks of regulatory uncertainty remain, and how to leverage the revised rules to identify new opportunities.

The Rule of Two: Preserved for Contracts, Eliminated for Orders

The so-called Rule of Two is a cornerstone of small business set-aside contracting. It generally requires agencies to set aside procurements for small businesses where there is a reasonable expectation that two or more small businesses will submit offers at fair market prices.

The Rule of Two is mandated by statute for acquisitions above the Micro-Purchase Threshold (MPT) and up to the Simplified Acquisition Threshold (SAT), which was \$350,000 as of October 1, 2025.¹ The Rule of Two is not a statutory requirement for acquisitions above the SAT, but it has been codified in FAR Part 19 for decades.

When the RFO effort was announced, there was substantial concern within the small business government contracting community that the Rule of Two would be eliminated for acquisitions above the SAT. That is because one of the stated objectives in the RFO is to

eliminate acquisition regulations that are not grounded in statutory requirements.²

In accordance with Executive Order 14275, “Restoring Common Sense to Federal Procurement,” non-statutory regulations should be removed unless they are “essential to sound procurement” because they are “necessary to support simplicity and usability, strengthen the efficacy of the procurement system, or protect the economic or national security interests.”³

Fortunately for small businesses, the FAR Council determined that the Rule of Two meets this standard, and so it was retained in the updated FAR Part 19. The Rule of Two is now codified at FAR 19.104-1(a) and applies to all contracts above the MPT.

Previously, contracting officers had to “first consider” setting aside contracts above the SAT for socioeconomic programs before considering a total small-business set-aside. The updated FAR Part 19 eliminates this preference for socioeconomic programs.

Moreover, the updated FAR Part 19 did not make the Rule of Two mandatory for orders issued under multiple-award

contracts. Instead, the new regulations provide that “contracting officers may, at their discretion, set aside orders placed under multiple-award contracts.”⁴ The new regulations go so far as to state that this exercise of discretion “is not a basis for protest.”⁵

Whether the Rule of Two is mandatory or discretionary for orders has been the subject of litigation and conflicting legal interpretations of the Small Business Act and, specifically, 15 U.S.C. § 644(r). While the Government Accountability Office (GAO) has held that the Rule of Two is *not* mandatory for orders, at least one judge on the Court of Federal Claims has reached the opposite conclusion.⁶ The updated FAR Part 19 effectively codifies GAO’s view that the Rule of Two is not mandatory when an agency decides to conduct a task or deliver order procurement under a multiple-award contract.

The outgoing Biden administration had proposed regulations that would have adopted the Court’s view that the Rule of Two *does* apply to orders.⁷ But the proposed FAR rule was withdrawn in June 2025, which was an early indication that the RFO effort would not mandate the Rule of Two for orders.⁸

The elimination of the Rule of Two at the order level is likely to reduce opportunities for small businesses. Absent a clear requirement to set aside orders, agencies will have more latitude to use unrestricted MACs even when multiple small businesses could potentially compete.

Order-Level Size Recertification Rules

During the last decade, as the use of multiple-award contracts (MACs) has expanded dramatically, policymakers have struggled with how to determine a small business concern’s eligibility for

orders. One area of significant debate has been whether a firm’s size eligibility for an order should be determined at the time of the proposal it submitted for the underlying MAC, or at the time of the proposal for the order.

In recent years, the recertification rules have distinguished between orders issued under “unrestricted” MACs and orders issued under MACs set aside for small businesses. For unrestricted MACs, offerors had to recertify at the order level. Recertification at the order level was generally not required for set-aside MACs unless the contracting officer requested recertification in connection with a specific order. These rules were codified in Small Business Administration (SBA) regulations and the former FAR 19.301-2(b)(2).

The updated FAR Part 19 eliminates small-business representation requirements at the order level. This includes removing the mandatory recertification requirements for orders under unrestricted MACs and the discretionary authority for COs to require recertification at the order level for set-aside MACs.

Under the new FAR 19.201-1(e)(1), a firm that is small at the time of its offer for the underlying MAC “is considered a small business concern for each order issued under the contract.” The new FAR 19.301(a) retains the requirement for firms to recertify their size status after a novation, merger, or acquisition and, for long-term contracts, at the five-year mark and before any option thereafter is exercised.

The removal of order-level recertification requirements represents a dramatic

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change to existing policy that should expand opportunities for firms that are small when they compete for the MAC but subsequently grow and become “large” during the contract period. Notably, however, the updated FAR recertification rules conflict with other parts of FAR Part 19 update. For example, although order-level recertifications are no longer required, the updated FAR still contemplates the possibility of a size protest in connection with an order under an unrestricted MAC.⁹

The updated FAR is also not aligned with existing SBA regulations that still reflect the old paradigm where size is determined at the order level for unrestricted MACs and at the contract level for set-aside MACs unless the contracting

officer requests recertification for a specific order.¹⁰ The current SBA regulations also contain detailed rules regarding the effect of a disqualifying recertification on order eligibility that are not reflected in the updated FAR Part 19.¹¹

The updated FAR provides that, after a contractor makes a disqualifying recertification, an agency may not count an order awarded to that contractor in the agency’s small business prime contracting goal achievements.¹² Unlike the SBA regulations, the updated FAR does not specifically address the impact of a disqualifying recertification on order eligibility.

The FAR Council and SBA will need to resolve these inconsistencies through

future rulemaking. Until then, small businesses face significant uncertainty regarding the applicable size recertification requirements and their effect on a company’s eligibility for task and delivery orders under MACs. This is an area where contractors must carefully assess the interplay and conflicts between the updated FAR rules and SBA regulations until they are reconciled.

8(a) Program Changes

A key feature of the 8(a) program has been the so-called “Once-an-8(a)-Always-an-8(a)” rule. As the name suggests, this rule provides that once an agency’s requirement is accepted into the SBA 8(a) program, that work must generally remain in the 8(a) program unless the SBA agrees to release it for non-8(a) competition.¹³

But the updated FAR Part 19 gives agencies more flexibility to release follow-on contracts from the 8(a) program. It provides that follow-on requirements do not need to remain in the 8(a) program if the follow-on contract “will be set aside under the HUBZone, SDVOSB, or WOSB programs.”¹⁴ This is a significant change that gives agencies greater flexibility to compete 8(a) requirements among other small businesses with different socioeconomic statuses.

The updated FAR also includes enhanced competition requirements for 8(a) awards. Under existing rules, agencies are required to compete 8(a) contracts that exceed a competitive threshold of \$4.5 million (or \$7 million for manufacturing contracts) if there is a reasonable expectation that at least two eligible 8(a) participants will submit offers at fair market prices.¹⁵

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This rule generally allows agencies to award sole source 8(a) contracts below the competitive threshold. But the updated FAR provides that, for acquisitions below the competitive threshold, “contracting officers must first try conducting the acquisition as a competitive 8(a) order using these government-wide contracts before proceeding with a sole source 8(a) award.”¹⁶ This requirement should create new opportunities for 8(a) contractors that hold government-wide contracts to compete for orders that may have previously been sole-sourced.

Conclusion

The FAR Part 19 overhaul represents a significant shift in small business contracting policy, but the real-world impact remains uncertain. Some changes are likely to increase small business opportunities while other changes may diminish the number of acquisitions set aside for small businesses.

The updated FAR Part 19 rules discussed above may be revised further following the notice and comment rulemaking process that will be completed for all new FAR sections developed as part of the RFO initiative. The FAR Council is unlikely to make major changes to key policy decisions in the rulemaking process, but it will hopefully add clarity where uncertainty remains. In addition, the SBA will need to revise its regulations to reconcile the differences between those regulations and the updated FAR provisions.

While the updated FAR is being formally codified through the rulemaking process, the new provisions are already taking effect through agency class deviations. To determine whether the updated FAR Part 19 applies to a given procurement,

contractors and acquisition professionals will need to check if the relevant agency has issued a class deviation to adopt the new FAR Part 19. **CM**

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The views expressed in this article are those of the author and do not necessarily reflect the views of Rogers Joseph O'Donnell or its clients. This

article is for general information purposes and is not intended to be and should not be construed as legal advice.

ENDNOTES

- 1 15 U.S.C. § 644(j)(1); see also 90 Fed. Reg. 41872, 41873 (Aug. 27, 2025).
- 2 See OMB Memorandum M-25-25, Overhauling the Federal Acquisition Regulation (May 2, 2025).
- 3 90 Fed. Reg. 16447, 16447-48 (Apr. 18, 2025).
- 4 FAR 19.111-2(a)(1).
- 5 FAR 19.111-2(a)(2).
- 6 ITility, LLC, B-419167, Dec. 23, 2020, 2020 CPD ¶ 412; The Tolliver Group, Inc., et al. v. United States, 151 Fed. Cl. 70 (2020).
- 7 89 Fed. Reg. 85072 (Oct. 25, 2024); 90 Fed. Reg. 3753 (Jan. 15, 2025).
- 8 90 Fed. Reg. 24773 (June 12, 2025).
- 9 See FAR 19.201-2(d)(1)(ii)(B).
- 10 See 13 C.F.R. § 121.404(c).
- 11 See 13 C.F.R. § 125.12.
- 12 Updated FAR 19.301(c).
- 13 See 13 C.F.R. § 124.504(d).
- 14 Updated FAR 19.108-11(a)(2).
- 15 See FAR 19.805-1(a).
- 16 Updated FAR 19.108-7(d)(1).



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Survival Guide to the Revolutionary Rewrite of Federal Acquisition Rules



Digital and AI-powered tools could turn the *FAR* from a static rulebook into a living, adaptive system; a practical guide that evolves with the procurement environment and supports faster, smarter decision-making.

By Joseph Wittusen

After 40 years of incremental updates, the *Federal Acquisition Regulation (FAR)* is undergoing its most ambitious transformation yet.

The “FAR 2.0 overhaul” is not just a regulatory refresh; it signals a fundamental shift toward a procurement system built on statutory clarity, agility, and outcome-driven decision-making. At a time when government contracting must keep pace with rapid technological change, geopolitical uncertainty, and growing demands for efficiency, this overhaul is urgent.

By simplifying language, streamlining processes, and aligning practices with today’s mission needs, FAR 2.0 promises to reduce barriers for agencies and industry alike. Understanding the origins, implementation timeline, and implications of this effort is critical for

stakeholders who must adapt quickly to a contracting environment designed for speed, clarity, and measurable results.

Why Overhaul the FAR? (40 Years in the Making)

The *FAR* is the federal government’s 2,000-page contracting rulebook. Since 1984, it has grown into a complex system that many argue slows procurement, inflates costs, and deters companies from entering the federal marketplace.

Instead of guiding, it often obstructs. For example, a small technology firm seeking to sell cybersecurity tools to an agency may spend months navigating compliance checklists and layered approval processes, only to abandon the effort in favor of faster-moving commercial markets.

A 2019 acquisition advisory panel and a 2024 U.S. Senate report, “Restoring

Freedom’s Forge,”¹ both concluded that the complexity of the *FAR* undermines efficiency and discourages innovation.² With nearly \$1 trillion spent annually on federal contracts, reform was unavoidable.

The FAR 2.0 overhaul is the first comprehensive rewrite in 40 years. The initiative aims to remove outdated, duplicative, and non-essential rules, returning the *FAR* to its statutory core. The latest version emphasizes plain English, practical guidance, and common-sense approaches.

In short, it is a long-overdue tune-up for a regulatory engine that has been sputtering under unnecessary weight.

To illustrate how FAR 2.0 is streamlining procurement, Figure 1 highlights select parts that have already undergone revision and the specific benefits tied to their modernization.

FIGURE 1. Streamlined *FAR* Parts and Benefits

FAR PART	FOCUS AREA	STREAMLINED BENEFIT
Part 1	Federal Acquisition System	Simplified core principles
Part 6	Competition Requirements	Expanded discretion and faster procedure
Part 10	Market Research	Fewer procedural burdens
Part 12	Commercial Items	Removed non-statutory barriers
Part 18	Emergency Acquisitions	Faster disaster and crisis response
Part 39	IT Acquisitions	Encourages commercial cloud and SaaS models

Timeline of the FAR 2.0 Overhaul

How did we get here? Figure 2 illustrates a quick timeline of key events leading up to and during the FAR 2.0 initiative:

To prepare for the FAR 2.0 overhaul, agencies, contractors, and stakeholders should actively engage with the evolving guidance, embrace streamlined deviation text where available, and participate in the comment process to shape final rules.

Contracting professionals should familiarize themselves with plain-language revisions, understand the removal of non-statutory mandates, and leverage new buying guides to replace prescriptive procedures.

Organizations should also adjust internal workflows to capitalize on faster acquisition processes and ensure staff are trained in applying simpler, principle-driven requirements.

Most importantly, now – during the deviation and feedback phase – is the critical time to test revised parts in practice, share lessons learned, and influence how the permanent FAR will look when codified later in 2025.

What It Means for Federal Acquisition Professionals

For contracting officers, program managers, and acquisition officials in government, the FAR 2.0 overhaul brings

both exciting opportunities and practical challenges. Here are some impacts on the government side:

Cultural Shift Compliance to Outcomes
For decades, the traditional FAR has shaped a compliance-first culture one where acquisition professionals often found themselves more focused on avoiding missteps than making smart decisions. FAR 2.0 seeks to fundamentally shift that dynamic.

As the Office of Federal Procurement Policy (OFPP) explained, the goal is to transition from a “regulatory based, compliance driven mindset to a more practical, efficient, and timely problem-solving approach.”³

This shift marks a significant cultural transformation. In the near term, contracting officers will need to retrain and recalibrate. Procedures they once knew by heart may no longer be applicable. Instead, they will operate under streamlined rules that encourage professional discretion.

To support this change, the Federal Acquisition Institute (FAI) and the Defense Acquisition University (DAU) are developing modernized training aligned with the new FAR language and supplemental buying guides.⁴

Agencies are encouraging their workforces to embrace innovation, including pilot programs and deviation-based

experiments. Acquisition innovation hubs and coaching networks are actively supporting these transitions.

For many federal buyers, FAR 2.0 presents a long-awaited opportunity to emphasize speed, simplicity, and sound business judgment without the looming fear of violating obscure provisions.

Navigating Dual Systems in the Near Term

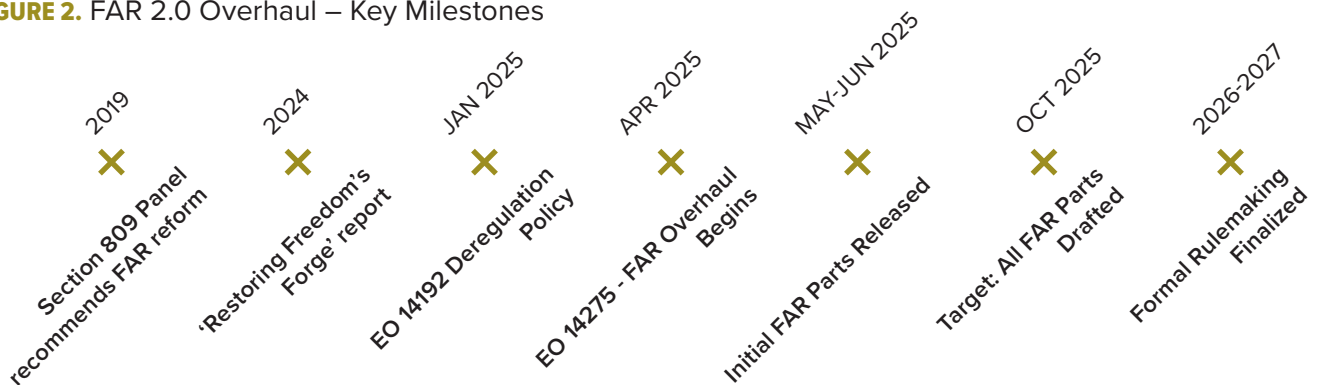
The road to full implementation is not without its bumps. Until the FAR is formally revised through the federal rulemaking process, agencies are relying on class deviations to implement the new rules. This means acquisition professionals must temporarily work from both the “old” FAR and new deviation memos, which is a situation that adds a layer of complexity.

For example, an acquisition team might draft a justification under the old FAR Part 6 full-and-open competition rules, only to discover that a deviation memo already allows a simpler, streamlined competition pathway.

Correcting the oversight requires re-writing documentation, re-routing approvals, and delaying the procurement, illustrating the practical risks of navigating two systems at once.

To reduce confusion, some agencies are opting to adopt the revised text in its

FIGURE 2. FAR 2.0 Overhaul – Key Milestones



entirety. But rollout speeds vary. By mid-2025, agencies such as the General Services Administration (GSA) and Department of Health & Human Services (HHS) had already implemented streamlined competition rules from the new Part 6, while others were still awaiting deviation approvals. This patchwork approach can complicate interagency collaboration or transitions between agencies.

Communication and training remain essential during this period. Acquisition leaders are issuing FAQs, policy notices, and decision trees to guide their teams through the evolving regulatory environment. Fortunately, the transition is expected to last only one to two years, after which FAR 2.0 will replace legacy rules government-wide with a unified set of procedures.

Agency FAR Supplements Under the Microscope

In addition to rewriting the FAR itself, Executive Order 14275 calls on agencies to align their supplemental regulations such as the *Defense Federal Acquisition Regulation Supplement (DFARS)* for the Department of Defense (DoD) or *General Services Acquisition Regulation (GSAR)* for GSA with the streamlined framework. This means agency procurement policy offices are now reviewing and pruning their own internal rulebooks to eliminate redundant or outdated requirements.

DoD, for instance, is undergoing a parallel DFARS reform effort to mirror the FAR rewrite. The logic is clear: eliminating a burdensome rule in the FAR only works if it does not resurface in agency-specific supplements. For acquisition professionals, this promises simplification across the board not just in the FAR, but also in internal guidance documents and procurement handbooks.

OFPP has instructed each agency to report quarterly on their efforts to streamline. The overarching message: every level of acquisition regulation must be justified, minimal, and mission-focused.

Empowerment and Responsibility

With a leaner FAR comes greater flexibility but also greater responsibility. Contracting officers will gain increased discretion in shaping acquisition strategies that best meet their mission needs.

Yet this empowerment also means there is less room to hide behind rigid rule interpretations. “Because the FAR says so” will no longer be a sufficient rationale.

Instead, acquisition professionals will need to lean on sound business judgment, ethical reasoning, and clear alignment with core objectives such as best value, competition, and integrity. The FAR 2.0 philosophy is rooted in trust: if we empower qualified professionals with clear goals and flexible tools, we will see better outcomes.

Of course, shedding the regulatory “security blanket” may feel uncomfortable at first. That is why agencies are also being urged to support their teams with practical buying guides, leadership reinforcement, and a culture that encourages thoughtful risk-taking rather than rigid rule-following.

For federal acquisition teams, FAR 2.0 represents both a liberation and a challenge. It promises to eliminate administrative clutter and allow professionals to focus on what truly matters: strategy, innovation, and results. As one senior official put it, “We’re cutting the outdated red tape and focusing on value for American taxpayers.”

That translates into more time spent negotiating smart deals and less time navigating a regulatory maze. While any transformation of this scale brings growing pains, the destination is clear: a more

agile, empowered, and outcome-oriented federal acquisition workforce.

Impact on Industry: What Contractors and Legal Teams Need to Know

The FAR 2.0 overhaul is not just an internal government affair; it has significant implications for contractors, suppliers, and the legal teams that support them. Here’s how FAR 2.0 is affecting (and will affect) the industry side of federal contracting:

Reduced Barriers to Entry

A major upside for industry is the push to eliminate barriers and level the playing field. The government wants more firms – especially innovative commercial companies and small businesses – to compete for contracts.

Many companies avoid federal work because of the maze of regulations. By trimming the FAR to its essentials, the government removes unnecessary barriers that have historically limited business participation. The administration’s fact sheet framed the goal as empowering all businesses to compete by reducing bureaucratic hurdles.

For contractors, this could mean fewer obscure clauses, certification requirements, and dense legalese. In effect, bidding might feel closer to commercial markets focused on delivering quality products on time rather than navigating pages of compliance rules.

New entrants may find the process less intimidating, potentially boosting competition and innovation in the federal market.

Lower Compliance Costs

Every regulation carries costs: legal reviews, compliance systems, training, and reporting. FAR 2.0 promises to cut these by slimming the rulebook.

A streamlined FAR Part 12, for example, removes non-statutory requirements in commercial acquisitions, sparing contractors from tracking government-unique clauses and flowdowns.

Eliminating duplicative rules also prevents firms from repeating the same compliance tasks under multiple provisions, simplifying administration and risk management. The initiative further rolls back certain policy-driven mandates such as environmental, social, or diversity reporting not required by statute.

While this eases burdens for most companies, firms that invested heavily in environmental, social, and governance (ESG) and diversity programs may need to adjust, since cutting these requirements does not erase prior costs or existing commitments. For these companies, the regulatory rollback may mean recalibrating compliance systems or repositioning program investments.

Still, the broader effect is clear: fewer regulations translate into lower overhead, leaner proposals, and more competitive pricing benefiting industry, government, and taxpayers alike.

Flexibility and Innovation in Contracts

Shifting from rigid rules to guiding principles and buying guides gives contractors more flexibility in crafting solutions.

Prescriptive regulations often stifle creative approaches, but a more flexible FAR lets industry propose innovative methods without violating one-size-fits-all rules.

For example, if a reporting requirement is no longer mandated, a contractor might suggest a modern alternative instead of following the “old FAR way.” The FAR 2.0 ethos emphasizes commercial best practices and market-driven solutions, making the government more receptive to commercial terms and processes.

As one GSA official noted, clearer and more flexible rules open the door to faster partnerships and innovation. This creates opportunities for industry to shape deals more efficiently, such as through agile development contracts or commercial software licenses, with less need for unique government customization.

Need to Stay Vigilant and Adapt

With major changes come uncertainty. Contractors and their legal teams must track evolving rules, noting which FAR parts have changed and which old ones no longer apply.

Compliance matrices built on the old FAR will need updates, and new model text should be reviewed closely. Many firms and associations (such as NCMA)⁵ are already offering webinars to parse the revisions.

Contractors working in areas like major systems (Part 34) or information technology acquisitions (Part 39) should study the new language to see what requirements have been dropped or simplified.

These shifts may create opportunities such as faster payments when outdated reporting requirements disappear but could also remove clauses that once offered protections, requiring direct negotiation. Smart contractors will adjust policies, update training, and revise proposal templates to align with the new FAR landscape.

Timeline Uncertainty: Plan for the Interim Period

Industry should recognize that formal codification of FAR 2.0 will take time. The deviation phase runs through late 2025, followed by notice-and-comment rulemaking that could extend into 2026 or 2027. In the meantime, solicitations may mix old FAR text with deviations, creating confusion.

Contractors must read solicitations carefully for agency notices or part substitutions and clarify with contracting officers that last year’s rules no longer apply. The government is trying to signal when streamlined rules are in use; but when uncertain, ask questions.

The upside is transparency: draft FAR 2.0 parts are publicly posted, and agencies are open to discussing how innovative approaches can be implemented smoothly in current and future contracts.

In summary, contractors stand to benefit from a leaner FAR through reduced overhead and a more business-friendly environment. But they should also take the initiative to understand and adapt to these changes.

The playing field is being redesigned, and those who stay informed and agile will thrive in the FAR 2.0 era. As one industry-facing official said, this overhaul is a “game-changer for industry” that opens the door to faster, more flexible partnerships. Now is the time for companies to walk through that door, armed with knowledge of the new rules and a readiness to compete vigorously, with a lot less paperwork weighing them down.

How to Prepare for FAR 2.0 (Tips for Agencies and Contractors)

Preparation is key for both government and industry as FAR 2.0 moves from concept to reality. Here are some practical steps to get ready for the new era of federal contracting:

Stay Informed and Follow Official Updates

Bookmark www.acquisition.gov – This is the central hub for all things FAR 2.0. You can see which parts have been rewritten, read the new text, and track agency deviation implementations.

Sign up for *FAR* news alerts – GSA offers an email list that notifies subscribers when new *FAR* updates are released.

Watch OFPP memos and agency policy flashes – government personnel should pay close attention to guidance issued by the OFPP and their own agencies.

Follow industry sources – Contractors should rely on reputable outlets such as www.acquisition.gov, agency procurement sites, and professional organizations like NCMA for summaries and analysis.

Stay proactive – Don't wait to be surprised by a rule change; stay plugged into these information streams now.

Engage and Provide Feedback

This overhaul is not a spectator sport; you have a chance to weigh in. The *FAR* Council is accepting informal public feedback on the draft streamlined *FAR* parts via the Revolutionary *FAR* Overhaul website (www.acquisition.gov/far-overhaul).⁶

If something in the new text seems unclear or problematic, speak up. Agencies and OFPP want to hear from practitioners.

For example, if you are a contracting officer who notices that a deleted clause might inadvertently remove an important contractor obligation, flag it. Or if you are a contractor who thinks a new simplified procedure is great, but could be even better with a tweak, let them know.

Early feedback can be emailed or submitted per instructions on the site. Later, when formal rules are proposed, there will be an official comment period. Plan to submit comments then as well through the Federal Register process.

Your practical insights can help shape a *FAR* that truly works. Remember, the goal is a *FAR* that makes sense in practice, not just on paper.

Train and Educate Your Team

Both agencies and contractors should invest in training to transition from the old *FAR* to *FAR* 2.0. Agency leaders can hold sessions to review each new deviation and explain the changes, while the FAI and DAU are already updating curricula to match the overhaul.

Contractors should run internal training sessions or lunch-and-learns, walking teams through “before and after” examples of solicitations and preparing FAQs so staff understand new flexibilities and responsibilities. Closing the knowledge gap early ensures everyone is fluent in the new language of federal contracting when *FAR* 2.0 is fully implemented.

Review and Update Internal Policies

Agencies must update procurement policies, manuals, and *FAR* supplements to match the overhaul, starting with rules tied to eliminated *FAR* text. Contractors should refresh standard procedures and compliance matrices, striking out clauses such as *FAR* 52.223-XX and adjust proposal and contract templates to reflect reduced requirements.

At the same time, stay alert: some items may shift from mandatory clauses to informal agency expectations. Keep communication open with contracting officers to ensure alignment during the transition.

Strategize for Transition Contracts

Review existing contracts – Ongoing awards under the old *FAR* may need adjustments if agencies issue deviations.

Plan for modifications and options – Long-term contracts could be modified to incorporate streamlined clauses. Be ready to negotiate reasonable adjustments.

Mind in-flight procurements – Solicitations released pre-overhaul but awarded post-overhaul may require updated acquisition plans.

Document decisions – Use simple memos to file (e.g., “Part 10 deviation applied to market research”) to avoid confusion later.

Monitor Legislative and Executive Actions

Remember that some *FAR* changes depend on Congress or new executive orders. The *FAR* overhaul team is identifying statutes that might need amendment and asking Congress for relief, and similarly pinpointing executive mandates that could be rescinded to fully implement the “common sense” approach.

Stay tuned to developments in legislation (for example, if the next National Defense Authorization Act includes provisions to adjust acquisition laws in support of *FAR* 2.0). Likewise, a change in administration policy could accelerate, slow, or alter parts of this overhaul.

While we cannot predict politics, being aware of the broader policy environment ensures you are not blindsided if priorities shift.

By taking these steps, you will be well-prepared for the *FAR* of the future. The key is to be proactive: The *FAR* 2.0 initiative is now fully underway, gaining momentum with each passing development. Make sure you and your organization are on board with a first-class ticket, not running to catch up.

What the Future Holds for FAR 2.0

By late 2025 or 2026, a slimmer *FAR* should be in place – focused on statutory requirements, with non-essential rules shifted into flexible guides. To prevent future “rule creep,” discretionary provisions will automatically expire after four years unless re-approved. This ensures the *FAR* remains a living, relevant document that adapts alongside technology and market practices.

Faster Procurement and More Innovation

If successful, FAR 2.0 could dramatically shorten acquisition cycles. Solicitations and proposals may become simpler, enabling agencies to adopt innovative methods such as down-selects and commercial solution openings.

Emerging firms could find it easier to compete, broadening the industrial base and boosting competition. As one DoD official noted, this is a “once-in-a-generation opportunity” to modernize how government and industry work together.

Accountability and Policy Goals

Streamlining will not mean abandoning safeguards. The statutory roots of small business programs, Buy American laws, and labor standards will remain in place. However, some executive order-based rules may be pared back.

The goal is to preserve fairness, transparency, and trust while shifting some policy objectives (e.g., sustainability, diversity) toward incentives and best practices rather than rigid checklists.

Stronger Industry-Government Collaboration

The overhaul has already fostered unprecedented dialogue between government and industry. This may continue post-rewrite, with buying guides becoming forums for sharing best practices. Future updates could be shaped more collaboratively, leading to pragmatic rules with fewer unintended consequences.

Continuous Improvement

FAR 2.0 is a beginning, not an endpoint. With technology advancing rapidly, the new framework aims to evolve without accumulating unnecessary rules. The combination of a leaner FAR and Strategic

Acquisition Guidance may soon leverage intelligent tools that deliver tailored, real-time guidance.

Imagine a searchable, app-based FAR that provides only the rules relevant to a contracting officer’s situation. Instead of sifting through more than 2,000 pages, an officer entering “sole-source IT services under \$10 million” could immediately see just the clauses, deviations, and guidance that apply.

How AI and Digital Tools Could Reshape Acquisition Guidance

- **Contextual Relevance:** AI could filter requirements based on contract type, dollar threshold, and agency-specific deviations, presenting only the pertinent rules.
- **Plain Language Summaries:** Dense regulatory text could be paired with AI-generated plain language explanations, helping practitioners at all levels quickly grasp the requirement.
- **Predictive Guidance:** By analyzing past procurements, digital tools could suggest likely clauses, highlight common pitfalls, or even flag risks (e.g., protest vulnerability).
- **Integrated Workflows:** Instead of referencing the FAR separately, an AI-enabled FAR app could sit inside acquisition planning tools populating solicitations and checklists automatically with the right provisions.
- **Real-Time Updates:** Notifications and push alerts could ensure contracting teams know the

moment a deviation or FAR update affects their projects, reducing the lag that often causes compliance issues.

In short, digital and AI-powered tools could turn the FAR from a static rulebook into a living, adaptive system; a practical guide that evolves with the procurement environment and supports faster, smarter decision-making.

The Bottom Line

By 2027, FAR 2.0 is expected to deliver a leaner, statute-rooted rulebook. The extent of its success will depend on execution, training, and adaptability across government and industry. The FAR 2.0 revolution is underway, redefining how government and industry partner for mission success. **CM**

Joseph Wittusen is a contracts professional with more than 15 years of experience in federal acquisition and contract management. He currently serves as Contract Manager with iTech AG, where he brings a practitioner’s perspective on how reforms like FAR 2.0 impact both government and industry.

ENDNOTES

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- 6 Revolutionary FAR Overhaul (RFO) - Revolutionary FAR Overhaul | Acquisition.GOV



POST ABOUT this article on NCMA Collaborate at <http://collaborate.ncmahq.org>.

Demonstrating Value in Legacy Contracts

Modernizing legacy contracts is essential and can maximize efficiency and cut costs.

BY CALVIN MITCHELL

Legacy information technology (IT) contracts account for the majority of the federal government's annual IT spending, consuming resources while perpetuating inefficiencies and risks.

This article suggests that transforming legacy contracts, rather than just replacing legacy systems, is essential for modernization.

Drawing on U.S. Government Accountability Office (GAO) reports, office of inspectors general findings, and case studies, it outlines four strategies: conducting a scope diet, consolidating contracts across agencies, leveraging technology and automation, and incorporating performance-based metrics.

Together, these strategies can reduce costs by up to 40-60%, strengthen cybersecurity, and improve service delivery, positioning federal acquisition professionals as leaders of government-wide transformation.

The federal government spends approximately \$95 billion annually on IT, yet nearly 80% (\$74 billion) is consumed by maintaining outdated legacy systems.

These systems not only drain resources

but also introduce significant cybersecurity and operational risks, all while frustrating federal employees and citizens who depend on them. IT acquisitions and management have been on the GAO High Risk List since 2015, underscoring persistent challenges with cost overruns, delays, and underperforming systems.

Layering compliance requirements, such as agency supplements and local clauses, adds numerous stipulations that may have been necessary at the time of implementation. However, when combined, they create a rigid framework with limited effectiveness, potentially reducing opportunities for innovation.

The problem extends beyond technology: the contractual frameworks that govern federal IT often incentivize maintenance over innovation. This article explores the strategic transformation of legacy contracts, which are crucial for sustaining operations, to minimize waste, enhance security, and improve mission performance.

Background

Aging federal platforms are costly to maintain, prone to failure, and increasingly

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Of the \$95 billion the federal government spends annually on IT, 80% is spent maintaining outdated legacy systems.



vulnerable to external threats. Critical systems rely on outdated programming languages, unsupported hardware, and architecture that fail to meet modern cybersecurity standards such as Zero Trust.

The GAO and inspectors general have repeatedly stressed the need for IT modernization, highlighting the financial and operational risks associated with legacy systems.¹ During a U.S. House of Representatives Oversight Committee hearing in April 2025, witnesses emphasized that 80% of IT budgets are dedicated to sustaining these outdated systems, leaving little room for innovation or modernization.²

The persistence of long-term, compliance-driven contracting models – what can be termed the “legacy contract trap,” – has locked agencies into vendor-dependent arrangements that stifle modernization efforts. Agencies have invested heavily in legacy systems, many of which remain critical, such as Farm Service Agency loan systems, Internal Revenue Service tax processing, and U.S. Department of Veterans Affairs benefits platforms.

A significant portion of federal IT funding is allocated to operations and maintenance (O&M), leaving limited resources for modernization efforts. Adherence to the Federal Information Security Modernization Act (FISMA), the Federal Risk and Authorization Management Program (FedRAMP), and other security mandates further increases costs and disincentivizes updates.

The potential for service interruptions when decommissioning old systems often leads leaders to prioritize maintaining existing systems over pursuing upgrades.

Transitioning to new systems necessitates parallel operations, effectively doubling costs and inviting increased scrutiny. For example, many mission-critical systems still rely on outdated programming languages such as COBOL and PowerBuilder, as GAO has highlighted in multiple modernization reports.

Conduct a Scope Diet

A “scope diet” requires agencies to rigorously evaluate legacy contracts to eliminate unnecessary requirements and align the scope of work with actual mission needs. Studies suggest that streamlining contract requirements can reduce total acquisition costs by 10-20%.³

GAO has also found that agencies spend roughly 40% of acquisition cycle time on contract administration.⁴ By simplifying requirements, renegotiating outdated terms, and updating extensions to reflect current market conditions, agencies can reduce costs without sacrificing performance.

Transparent modification processes also build trust with stakeholders by demonstrating how changes will generate better value. For instance, one agency renegotiated a long-term IT services contract by removing unused help desk tiers, resulting in millions in savings and

aligning resources with actual mission needs. Identify outdated deliverables that add cost but little value, such as duplicative reports or redundant documentation.

Suggest automation or eliminating redundant tasks to absorb efficiency savings. Propose modular contracting solutions by breaking the contract into leaner work packages for sustainment, modernization, and compliance.

Show how separating scope reduces transition risk and encourages competition. Recommend slimmer SLAs focused on mission outcomes instead of compliance metrics.

Offer incentive structures that reward both vendor and agency for reducing waste, such as a fixed fee for baseline operations and maintenance plus an award fee for retiring legacy modules.

Consolidating Contracts Across Agencies

Federal agencies often manage multiple contracts for similar IT services, leading to duplicate spending. Consolidation can help achieve economies of scale, leverage discounts, and simplify administration. GAO reported that overlapping IT contracts increase costs and reduce efficiency.⁵

Governmentwide acquisition contracts and category management have shown savings of 5-15%.⁶ Centralizing procurement saves money, reduces vendor lock-in, and accelerates modernization.

However, agencies have unique requirements due to distinct statutory missions and customized IT needs. Chief information security officers often impose unique security controls despite common standards such as NIST/FedRAMP. Tailored reports and workflows hinder standardization across agencies.

Congress also appropriates IT funds through separate accounts by agency,

making pooled funding challenging. While consolidation offers benefits, agencies must address transition complexity and consider impacts on small businesses.

Leveraging Technology and Automation

Modernizing legacy contracts also requires harnessing technology and automation. Automated workflows streamline repetitive processes, reduce errors, and minimize the need for personnel to perform low-value tasks.

Agencies should identify processes most suitable for automation, adopt interoperable platforms with built-in connectors, and integrate automation across both modern and legacy systems. For example, workflow automation can decompose complex functions into smaller, manageable tasks that reduce waste and improve speed.

Demonstrating the use of modern technology within legacy contracts signals forward-thinking acquisition practices and ensures efficiency gains both now and in the future. For example, the General Services Administration (GSA) successfully applied robotic process automation to invoice validation, reducing manual effort and processing errors while demonstrating measurable efficiency gains.

Most contracts require “efficient, effective performance.” Vendors can use automation (e.g., robotic process automation, artificial intelligence, workflow tools) internally if deliverables are met. Automating reports, invoices, security checks, or help-desk triage reduces delivery costs without a new agreement.

Automation lowers labor hours and risks while maintaining service levels. Instead of manual reports, vendors can create live dashboards showing key performance indicator

(KPI) performance. Automated compliance scanning meets FISMA/NIST/FedRAMP baselines quickly, demonstrating modernization efforts without contract changes.

In O&M heavy contracts such as loan servicing or claims management, bots can handle repetitive tasks without altering scope. Internal chatbots can support help-desk staff before deploying agency-facing bots. These practices can be highlighted in recomplete narratives.

Incorporating Performance-Based Metrics

Legacy contracts often emphasize compliance with processes rather than measurable results. To break this cycle, agencies must incorporate KPIs, service-level agreements (SLAs), and outcome-based deliverables. Shifting the focus from input to outcomes ensures accountability and efficiency.

Both GAO and inspectors general stress the role of KPIs in contract oversight.⁷ Routine KPI assessments allow agencies to detect inefficiencies, track performance trends, and enforce accountability.

By embedding performance-based metrics into legacy contracts, agencies can reduce waste, drive incremental improvements, and enhance service delivery. For example, agencies can establish measurable outcomes such as resolving 95% of system incidents within four hours, ensuring accountability and mission alignment. Agencies should use balanced KPIs, including uptime, cost per transaction, automation savings, and customer satisfaction.

Vendors require fair risk allocation, ensuring they are accountable only for what they control, with tiered incentives rather than punitive all-or-nothing approaches. Transparency through real-time dashboards, baseline metrics, and joint governance helps create fairness and trust.

When implemented correctly, performance metrics tied to payment can drive modernization while aligning incentives for both parties.

Conclusion

Maximizing efficiency and cutting costs in legacy contracts is challenging but achievable with deliberate strategies. Conducting a scope diet, consolidating contracts across agencies, leveraging technology and automation, and incorporating performance-based metrics can collectively transform legacy agreements from liabilities into assets.

Federal contract managers must champion these approaches to escaping the institutionalized contracting models that perpetuate maintenance over innovation and turn IT from a financial burden into a strategic advantage.

A central lesson across case studies is that modernization cannot be driven by government alone. Without a joint leadership model, legacy IT systems can lead agencies to adopt risk-averse practices, while vendors may follow compliance-driven revenue models. However, with such a model, modernization becomes a collaborative partnership instead of just a mandated requirement.

Agencies hold the budget authority and statutory levers, but vendors manage the day-to-day systems, the compliance frameworks, and the talent pipelines that keep critical systems running.

The future of legacy contracts will be shaped by modular, performance-driven, and technology-enabled solutions that prioritize innovation and mission success. These strategies align with ongoing Office of Management and Budget and GAO initiatives, including GSA IT Modernization Centers of Excellence, which provide

further resources for agencies to accelerate transformation.

Legacy contracts need not hold agencies back. Moving forward requires more than compliance; it needs leadership from both government and industry.

Agencies should focus on outcome-based performance and streamlined scopes, while vendors should offer automation, transparency, and proactive proposals.

Start now, start small, but work together.

Eliminate wasteful contract scopes, introduce automation, and measure what matters: cost, uptime, and citizen impact. Modernize every contract by focusing on real value for the mission and taxpayers, beyond mere compliance. **CM**

Calvin Mitchell Jr. is a senior procurement executive with extensive experience in federal acquisition, contract management, and interagency agreements. He has led modernization initiatives across the Department of Education and other federal agencies, with a focus on performance-based contracting, IT transformation, and government-wide efficiency reforms. His work integrates strategic acquisition planning, oversight, and policy development to improve mission outcomes. He is also an active contributor to the contracting community, sharing thought leadership on innovative acquisition strategies and federal modernization efforts.

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