

EVENT

# Overview of the FAR Proposed Rule on Semiconductor Restrictions and Implications for Contractors

Virtual

April 1, 2026 | 12:00 pm ET - 1:00 pm ET

Event Sponsor: ABA Public Contract Law Section's Subcontracting, Teaming, and Supply Chain Committee

The ABA Public Contract Law Section's Subcontracting, Teaming, and Supply Chain Committee invites you to join our virtual program examining the FAR Council's proposed rule implementing semiconductor procurement restrictions under Section 5949 of the FY 2023 National Defense Authorization Act. Tracye Winfrey Howard and Jonathan Clark of Wiley Rein LLP will present, introduced by Frank Murray (Foley & Lardner LLP).

Beginning in December 2027, federal agencies will be prohibited from purchasing certain electronic products and services that incorporate semiconductors from specified Chinese companies—SMIC, CXMT, and YMTC—as well as entities associated with other foreign countries of concern or otherwise determined by the U.S. Government to pose national security threats. These restrictions will have far reaching implications for contractors at all tiers of the federal supply chain.

This program will provide an overview of the proposed rule's key provisions, including:

- The scope of covered semiconductor products and services
- The "reasonable inquiry" and self certification framework
- Pre and post award disclosure and reporting obligations
- Exceptions and waiver mechanisms available to agencies and contractors

## Related Professionals

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## Practice Areas

FAR Overhaul  
Government Contracts

The discussion will also include a brief update on the current state of the Government's restrictions on contractor use of Anthropic technology.

This program will be of interest to government contracts attorneys, in house counsel, compliance professionals, and contractors and subcontractors navigating evolving supply chain and national security requirements.