

GSA Announces Plans to Incorporate the “Revolutionary FAR Overhaul” Into GSA Schedule Contracts

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For the past several months, the FAR Council has been undertaking a comprehensive overhaul of the Federal Acquisition Regulation, to remove provisions not required by statute and to “support simplicity and usability,” in accordance with the April 15 Executive Order on “Restoring Common Sense to Federal Procurement.” As part of this process, the FAR Council has issued model “deviations” for each of the overhauled Parts of the FAR, which individual agencies can adopt until formal changes to the FAR can be issued through notice and comment rulemaking. Although a number of agencies have adopted certain deviations, not all agencies have adopted all of the overhauled parts of the FAR. As a result, the actual impact of the FAR Overhaul on contractors up to this point has been unclear.

However, the U.S. General Services Administration (GSA) recently announced its plan to issue a new “Refresh” and Mass Modification to the GSA Multiple Award Schedule, which will effectively incorporate the FAR Overhaul into all new GSA Schedule Contracts as well as the over 14,000 existing GSA Schedule Contracts. This upcoming Refresh is expected to be issued some time in November 2025 and to include the following changes to GSA Schedule Contracts to implement the FAR Overhaul:

- Adds a total of 51 clauses, which update and replace existing clauses;
- Updates an additional seven standard clauses and Solicitation provisions;

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- Adds five new clauses, including new clauses related to security requirements; and
- Deletes a total of 36 clauses, some of which are removed in their entirety and others of which are addressed in other updated clauses.

Although the full text of the changes to be made in the upcoming Refresh has not yet been released, many of the changes in the Overhauled Part 52 clauses appear to be relatively modest – including a number of “plain language” changes that don’t materially alter the substance of the affected clauses. Other changes simply move content from one set of clauses to another, without materially altering the substance of the affected clauses. Nevertheless, GSA Schedule contractors should carefully review the new Refresh to determine whether any of the overhauled clauses require changes to the contractor’s existing policies, procedures, or internal controls – including, for example, those overhauled clauses that impose new or updated certification or reporting requirements, or that are required to be flowed down to subcontractors. Existing GSA Schedule Contractors will have 90 days from the date of the Refresh to accept the Mass Modification implementing the overhauled clauses into their contracts.

For more information on the ongoing FAR Overhaul initiative, including an in-depth analysis of each of the overhauled FAR Parts, please visit Wiley’s Decoding the FAR Overhaul site.