

FAR Part 10 Reform: What Government Buyers and Contractors Need to Know

The federal acquisition community is experiencing a monumental shift under Executive Order 14275, signed in April 2025. This document provides a comprehensive analysis of the Revolutionary FAR Overhaul (RFO), with specific focus on changes to FAR Part 10 (Market Research). We examine the streamlined structure, shift to principles-based requirements, emphasis on commercial solutions, and implications for government buyers and contractors. This guide also covers implementation timelines, key milestones, and practical strategies for navigating these reforms.

The Revolutionary FAR Overhaul: Background and Context

The Federal Acquisition Regulation (FAR) serves as the primary rulebook governing how the federal government purchases goods and services, representing over \$700 billion in annual spending. Executive Order 14275, signed in April 2025, has initiated what experts call the Revolutionary FAR Overhaul (RFO)—the first comprehensive rewrite of the regulation since its establishment in 1984.

Why Reform Now?

After decades of incremental changes and additions, the FAR has become increasingly complex, with overlapping requirements that can impede efficient procurement.

Reform Objectives

The RFO aims to create a leaner, more principles-based acquisition system that reduces compliance burden while maintaining accountability and emphasizing commercial solutions.

Implementation Approach

Rather than a single massive rewrite, the FAR Council is using a phased approach with model deviations for agencies to test before formal rulemaking.

FAR Part 10, which governs market research practices, is among the first sections targeted for reform. This prioritization reflects the administration's recognition that effective market research is foundational to successful acquisitions and that current requirements may be unnecessarily burdensome.

The rewrite philosophy focuses on maintaining only what's legally required or essential for good procurement practices. All non-statutory elements will be subject to a new sunset provision, requiring review and renewal every four years. This marks a significant departure from the historical approach of continuous expansion and accumulation of requirements.

Key Changes to FAR Part 10: From Prescriptive to Principles-Based

The proposed reform to FAR Part 10 represents a fundamental shift in regulatory philosophy. Rather than prescribing detailed procedures for every scenario, the new approach establishes core principles and gives agencies flexibility in implementation. This shift aligns with broader government efforts to modernize acquisition and reduce regulatory burden.

The current four-section structure (**Scope, Policy, Procedures, Contract Clause**) is being condensed into three streamlined sections (**Scope, Market Research Requirements, Clause**). This reorganization removes duplicative content and makes the regulation easier to navigate for both government buyers and industry partners.

Perhaps most significantly, the reform moves detailed guidance out of the regulation itself and into supplementary Buying Guides. This approach allows best practices to evolve without requiring formal rulemaking, creating a more adaptable framework that can keep pace with market innovations.

Current Approach

Detailed, prescriptive procedures for various scenarios (sustainability, bundling, cyber defense, etc.)

New Approach

High-level principles with flexibility in implementation; detailed guidance moved to non-regulatory Buying Guides

1

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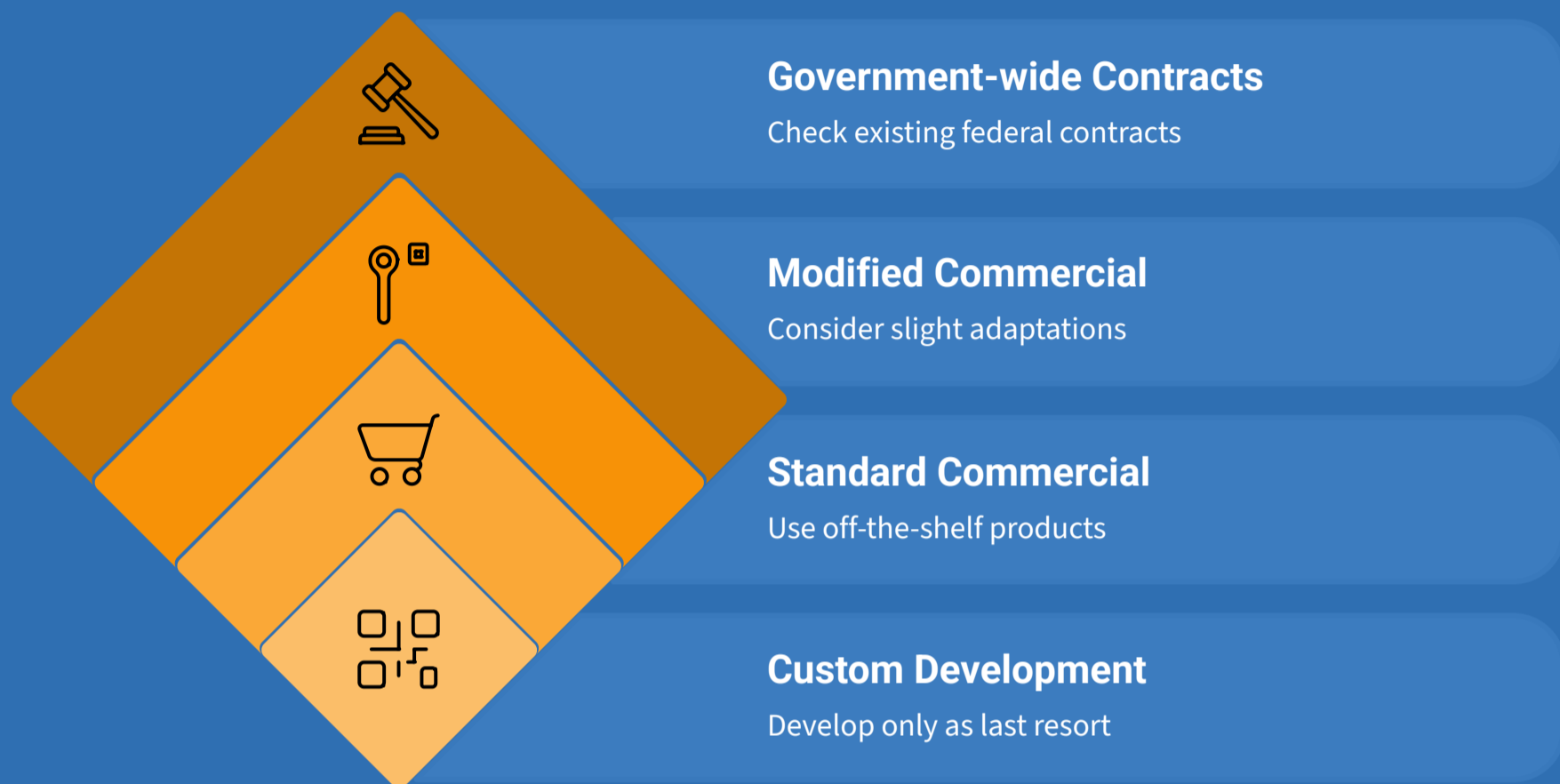
Transition Period

Model deviations allowing agencies to test streamlined approaches before final rules are implemented

This principles-based approach demands more professional judgment from acquisition officials. While it reduces checkbox compliance, it increases the need for thoughtful documentation of market research decisions and their rationale.

Commercial Emphasis: Prioritizing Existing Solutions

A cornerstone of the FAR Part 10 reform is the strengthened emphasis on commercial products and services. The revisions explicitly require agencies to prioritize commercial solutions whenever practicable, creating a "commercial-first" mindset in federal procurement.



This hierarchical approach requires acquisition professionals to document their consideration of existing solutions before pursuing custom development. The reform reinforces the principle that government should leverage the innovation and economies of scale from the commercial marketplace whenever possible.

For contractors, this shift presents significant opportunities. Commercial vendors will face fewer compliance hurdles, as evidenced by the narrowed applicability of the Market Research clause (FAR 52.210-1). Under the proposed changes, this clause would only apply to noncommercial acquisitions over \$6 million, exempting commercial procurements from this particular requirement.

"The commercial-first emphasis isn't just about compliance—it's about accessing innovation and competitive pricing that exists in the marketplace. When government leverages what industry has already developed, everyone wins: agencies get better solutions faster, and taxpayers get better value."

This commercial emphasis aligns with longstanding bipartisan efforts to reform acquisition, dating back to the Federal Acquisition Streamlining Act of 1994 and continuing through multiple administrations. The difference now is the comprehensive nature of the reform and the explicit reduction of regulatory barriers for commercial solutions.

FAR Reform Timeline and Implementation Roadmap

The Revolutionary FAR Overhaul follows a methodical implementation plan spanning multiple years. While Executive Order 14275 provides the broad framework, the actual transformation involves a complex sequence of guidance, model deviations, testing, and formal rulemaking.

1

Initial Guidance Phase (April-May 2025)

OMB issued implementation guidance 20 days after the Executive Order. This phase established the reform philosophy and approach.

2

Model Deviation Phase (Summer-Fall 2025)

The FAR Council publishes model deviation texts for agencies to adopt ahead of formal rulemaking, including the streamlined FAR Part 10.

3

Public Feedback Period (Fall 2025)

Informal feedback on revised FAR parts is collected by September 30, 2025, to inform final rulemaking.

4

Formal Rulemaking (2026-2027)

After model deviations are tested and refined, the formal rulemaking process begins, extending into 2026 or 2027.

During this extended transition period, agencies and contractors must navigate a hybrid environment where some agencies may operate under model deviations while others follow current regulations. The FAR Council's ongoing release of updated Buying Guides will provide practical guidance during this transition.

A key milestone occurred on August 15, 2025, when the Office of Federal Procurement Policy (OFPP) launched a landmark update to federal commercial buying, authorizing agencies to immediately remove one-third of non-statutory requirements from new contracts. This early action demonstrates the administration's commitment to rapidly implementing aspects of the reform that don't require formal rulemaking.

The implementation roadmap also includes a critical new feature: a sunset provision (proposed FAR 1.109) that would cause all non-statutory FAR sections to automatically expire four years after becoming effective unless renewed. This forces periodic review and prevents regulatory accumulation over time.

Impact on Government Acquisition Officials

For contracting officers and acquisition teams, the FAR Part 10 reform creates both opportunities and challenges. The shift to principles-based regulation provides greater flexibility but also demands more professional judgment and accountability.



Increased Flexibility

Acquisition officials gain more discretion in how they conduct market research, with fewer prescriptive steps and more emphasis on proportionality to acquisition size and complexity.



Documentation Emphasis

With fewer specific requirements, the importance of documenting market research decisions and rationale increases significantly.



Training Needs

Familiarity with the new Buying Guides becomes essential, as these resources—rather than the FAR itself—will contain detailed best practices and guidance.

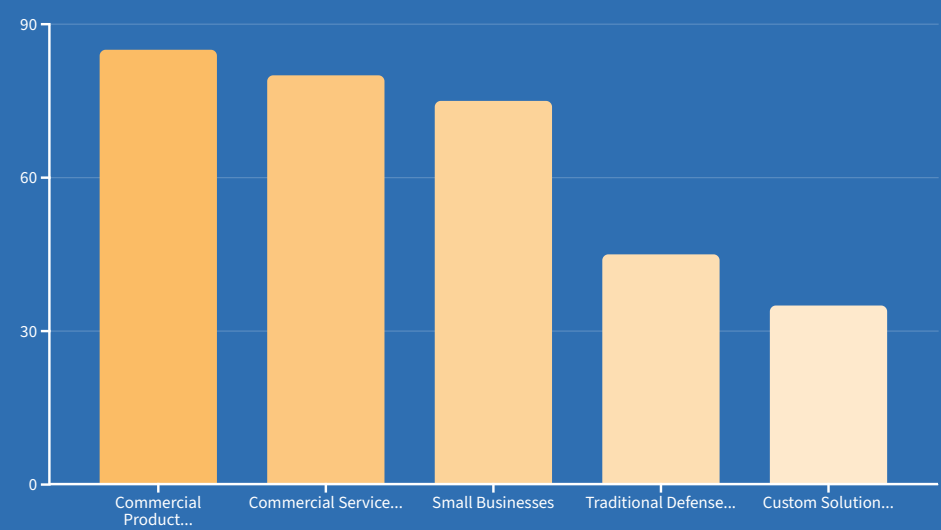
The reform also changes the relationship between contracting officers and program offices. With less procedural guidance in the FAR itself, acquisition teams will need to develop stronger internal processes and collaboration methods. Early planning becomes even more critical, as does the ability to translate mission needs into effective market research strategies.

Contracting officers should anticipate challenges during the transition period as agencies may interpret and implement the new principles differently. Sharing best practices across agency boundaries will be essential for building a consistent understanding of the new framework. Professional associations like the National Contract Management Association (NCMA) and Digital Acquisition Innovation Labs may play increased roles in facilitating this knowledge exchange.

Implications for Government Contractors

The FAR Part 10 reform creates significant opportunities for industry partners, particularly those offering commercial products and services. The commercial-first emphasis and reduced compliance requirements for commercial solutions represent a meaningful reduction in barriers to entry for companies new to the federal marketplace.

For established government contractors, the reform requires adapting to a more flexible market research environment. Agencies will have greater discretion in how they conduct research, which could lead to more diverse approaches across the federal landscape. Contractors should anticipate and prepare for this variability by building relationships with agencies and monitoring their specific implementation of the model deviations.



Key Action: Monitor Agency Deviations

Track which agencies adopt model deviations early and understand how their market research practices evolve. This intelligence can inform your engagement strategy.

Key Action: Emphasize Commercial Credentials

Clearly articulate how your offerings align with commercial standards and practices. Document commercial sales to non-government customers to strengthen your position.

Key Action: Review Compliance Programs

Assess which compliance requirements may be reduced or eliminated for commercial offerings under the new framework. This could yield significant cost savings.

Key Action: Engage with Buying Guides

As new Buying Guides are published, review them thoroughly to understand how agencies will be guided to conduct market research in your sector.

The narrowed applicability of the Market Research clause (FAR 52.210-1) to only noncommercial acquisitions over \$6 million represents a tangible compliance reduction for many contractors. Companies should document which of their offerings qualify as commercial to maximize the benefit of this change.

The Rise of AI-Enabled Market Research

The FAR Part 10 reform creates fertile ground for artificial intelligence tools to transform the market research process. As prescriptive requirements give way to principles-based approaches, acquisition professionals have more flexibility to leverage innovative technologies for gathering and analyzing market intelligence.

AI-enabled market research platforms like AcquisitionAI are already demonstrating remarkable efficiency gains. These systems combine traditional AI capabilities (classification, keyword searches, spend analysis) with newer agentic AI approaches that can adapt in real-time to discover vendors and map technology landscapes.

85%

Time Reduction

AI-enabled market research has demonstrated the ability to cut research timelines by 85% compared to traditional methods.

65%

Increased Small Business Discovery

AI tools can uncover qualified small businesses that might be missed in traditional market research approaches.

3x

Competitive Response Improvement

Agencies using AI-enabled market research report receiving three times more qualified responses to solicitations.

The principles-based nature of the reformed FAR Part 10 supports this technological evolution. Rather than mandating specific research steps or sources, the new approach emphasizes proportionality and effectiveness—goals that AI can help achieve. Human-in-the-loop safeguards ensure analysts remain in control while AI accelerates vendor discovery, requirement mapping, and technology assessment.

For both government buyers and contractors, understanding these AI capabilities becomes increasingly important. Agencies that effectively leverage these tools will conduct more thorough market research with less effort, while contractors that understand how these systems work can ensure their capabilities are properly represented in the data these tools analyze.

Preparation and Transition Strategies

Successfully navigating the FAR Part 10 reform requires thoughtful preparation from both government acquisition teams and industry partners. The transition period—with its model deviations, new Buying Guides, and eventual formal rulemaking—presents both challenges and opportunities.



Assess Current Practices

Review your organization's existing market research approaches against the new principles-based framework to identify gaps and alignment.



Train Key Personnel

Develop training on the new principles, Buying Guides, and decision documentation requirements for all stakeholders in the acquisition process.



Update Internal Processes

Revise templates, checklists, and internal guidance to reflect the more flexible, principles-based approach to market research.



Monitor Implementation

Track agency adoption of model deviations and emerging best practices as the reform rolls out across the federal landscape.

For Government Acquisition Teams

- Develop documentation templates that capture market research decisions and rationale in a consistent format
- Establish stronger collaborative processes between contracting and program offices for early acquisition planning
- Create knowledge management systems to share effective market research approaches across the organization
- Build relationships with industry associations to improve market awareness

For Industry Partners

- Assess which of your offerings qualify as commercial products or services under FAR definitions
- Review government-facing marketing materials to ensure they clearly communicate commercial aspects
- Monitor agency Requests for Information to understand how market research practices are evolving
- Participate in industry days and provide feedback on model deviations when opportunities arise

Both sectors should view the transition period as an opportunity to shape implementation. The FAR Council is actively seeking feedback on model deviations, and this input will influence the final rulemaking. By engaging proactively during this formative period, organizations can help ensure the reform achieves its goals of streamlining procurement while maintaining accountability.

Conclusion: Embracing the New Market Research Paradigm

A Fundamental Shift

The FAR Part 10 reform represents not just a regulatory change but a philosophical transformation in how government approaches market research. By moving from prescriptive procedures to guiding principles, the reform creates space for innovation while maintaining focus on core acquisition objectives.

Commercial Emphasis

The strengthened preference for commercial solutions reflects a bipartisan recognition that government benefits when it leverages existing marketplace innovations. This emphasis creates opportunities for new entrants and commercial vendors while potentially reducing costs and accelerating delivery timelines.

Transition Challenges

The multi-year implementation process will create a period of variability as agencies adopt model deviations at different rates. Both government and industry must develop strategies to navigate this transition period effectively.

The FAR Part 10 reform serves as a bellwether for the broader Revolutionary FAR Overhaul. Its emphasis on principles over procedures, commercial solutions over custom development, and flexibility over rigid compliance indicates the direction of future FAR changes. Organizations that successfully adapt to this new market research paradigm will be better positioned for subsequent reforms.

For acquisition professionals, the reform presents an opportunity to exercise greater judgment and creativity in how they approach market research. While this increased flexibility comes with greater responsibility for documentation and justification, it also creates space for more effective, tailored approaches that better serve mission needs.

For industry partners, particularly those offering commercial solutions, the reform reduces barriers and compliance burdens. By emphasizing their commercial credentials and understanding how agencies implement the new framework, contractors can position themselves advantageously in this evolving landscape.

As we move through this transition period, ongoing dialogue between government and industry becomes even more important. The principles-based nature of the reform requires shared understanding and collaboration to achieve its full potential. By embracing this new paradigm together, the federal acquisition community can create a more efficient, effective system that delivers better value for taxpayers and better solutions for government missions.

References and Sources

This section provides detailed citations for the foundational documents, regulations, and guidance referenced in this analysis of the FAR Part 10 reform and the broader Revolutionary FAR Overhaul.

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Professional Resources

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