The RFO and the System for Award Management (SAM.GOV)

What impacts is the RFO having on SAM.GOV?

The Revolutionary FAR Overhaul (RFO) is streamlining the FAR to its statutory roots and to policies necessary to support sound procurement. The effort will result in changes to provisions, clauses, and representations and certifications across FAR parts. These changes will impact the System for Award Management (SAM.GOV), the official U.S. government website where entities register to do business with the federal government.

Today, SAM.GOV includes three (3) types of representations and certifications that an entity attests to in order to do business with the government, as follows:

Type of Representation & Certification	Description
Type 1: *Entity-level*	Representations and certifications that are specific to the entity
Type 2: *Procurement-specific*	Representations and certifications that are specific to the procurement
Type 3: *By Submission of Offer*	Representations and certifications that do not collect information at all from the entity registering

While subject to change, the current RFO vision is that SAM.GOV will continue to collect Type1: *Entity-level* representations and certifications, but that Type 2: *Procurement-specific* and Type 3: *By Submission of Offer* representations and certifications will no longer be collected in SAM.GOV.

In the future, if removed from SAM.GOV, Type 2: *Procurement-specific* and Type 3: *By Submission of Offer* representations and certifications will be included in the solicitation and resultant contract(s).

When will the changes occur?

The FAR Council, including the Office of Federal Procurement Policy, are working closely with GSA's Office of the Integrated Award Environment (IAE), which manages SAM.gov, and the Procurement Committee for e-Government to assess the impacts of the RFO to SAM.GOV. The FAR Council will share a full list of impacted provisions, clauses, representations and certifications as well as plans for system changes and implementation timelines in the early next fiscal year. SAM.GOV systems changes are not anticipated to occur before January 2026, at the earliest.

What will happen in the interim (e.g., after an RFO deviation that impacts SAM.GOV is implemented but before SAM.GOV is updated to reflect the changes)?

Until the changes are made in SAM.GOV, entities may still be required to submit information in SAM.GOV that is no longer required/enforced. As agency RFO deviations are issued, they will likely require contracting officers to use the updated provisions and clauses. This may be supported through the agency's contract writing system, or may require the contracting officer to manually ensure the updated provisions and clauses are incorporated into solicitations and contracts. Agencies were informed by OFPP to implement the model deviation text for Part 4 within 30 days but that they may delay the effective date of their deviations to reflect the time required to update their systems, subject to a deadline established by OFPP after additional agency consultation.

Recognizing these changes to SAM will not immediately be implemented, when agencies implement the model deviation, they may advise contracting officers to include language similar to the following in all solicitations over the micro-purchase threshold until advised that SAM updates have been completed:

"System updates may lag policy updates. The System for Award Management (SAM) may continue to require entities to complete representations based on provisions that are not included in this solicitation. Examples include 52.222-25, Affirmative Action Compliance, 52.204-26 Covered Telecommunications Equipment or Services-Representation, and 52.223-22 Public Disclosure of Greenhouse Gas Emissions and Reduction Goals-Representation. Contracting officers will rely on representations from offers based on provisions in the solicitation. Entities are not required to, nor are they able to, update their entity registration to remove these representations in SAM."

While these interim steps are recognized as duplicative and potentially burdensome, they are intended to be short-term during the change process.

So, what are the long-term benefits of these changes to the FAR and SAM.GOV?

The RFO changes will deliver significant long-term benefits for both government and industry participants in the federal procurement process.

For the government, the changes will result in improved procurement outcomes through more accurate and traceable terms and conditions that are specific to each individual procurement. These benefits support the RFO's overarching goals of simplifying federal procurement, improving outcomes, and reducing burden on both government and industry.

For industry, the changes will result in a SAM.GOV registration process that is more efficient and easier to navigate. In addition, once procurement-specific representations and certifications are moved to the individual solicitations, industry can anticipate reduced administrative burden and fewer requests to update company information in SAM.GOV.

Updated August 12, 2025