



# GSA Perspectives on the FAR Overhaul

**Presented by:**

Jeff Koses, Senior Procurement Executive, GSA

**January 8, 2026**





## **Jeff Koses**

Senior Procurement Executive  
U.S. General Services Administration

Jeff Koses is recognized as an innovative leader in the field of acquisition.

As Senior Procurement Executive for the General Services Administration, Jeff has three priorities: 1) strengthen the acquisition workforce, 2) smart and effective buying and 3) healthy and productive industry relationships. Jeff and his team are working to ensure an acquisition system that is modern, accessible, and streamlined.

Jeff is a voting member of the Federal Acquisition Regulatory Council where he is a champion for acquisition reform. He also oversees the Federal Acquisition Institute which supports 180,000 members of the civilian acquisition workforce.

Jeff serves as the co-chair of the Federal Acquisition Institute Board of Directors where he champions the needs and interests of the federal acquisition workforce.

Jeff serves as GSA's Representative to the U.S. AbilityOne Commission, the largest single source of employment, in the United States, for people who are blind or have significant disabilities. In his AbilityOne role, he emphasizes expanding competitive integrated employment, effective governance and results, and partnership as means to increase good and optimal jobs. Jeff served as Chair of the AbilityOne Commission from October 2021 until February 2025.

Jeff was a 2022 recipient of the Presidential Rank Distinguished Executive Award as well as numerous other awards.

Earlier in his career, Jeff created GSA's premiere vehicle for integrated professional services, OASIS, and managed 25 multiple award schedules with annual sales of over \$22 billion, supported emergency acquisition and oversaw acquisition for GSA Global Supply.

He holds a bachelor's degree in History and Political Science from Washington University in St. Louis, MO. He also holds a masters in Acquisition Management.

# EO 14275: Restoring Common Sense to Federal Procurement

- The FAR is too big, too complicated.
- It keeps companies from doing business with the US Government.
- EO directed us to strip out non-statutory requirements.
- Make the changes now and implement via deviations.
- Rewrite agency supplements to the FAR.

# The Revolutionary FAR Overhaul

1. Biggest challenges.
2. Where we are with the rewrite.
3. Biggest changes made to date and explore their impact on GovCon.
4. What comes next?
5. Cultural change challenge and the help that is needed from the GovCon community.

# Biggest Challenges

- Timeline and Process
  - Benefit: Forces action.
  - Drawback: Community understanding.
- Interplay with other key acquisition executive orders.

# Commonalities across the acquisition EO's

- Reducing prices, admin costs and regulations.
- Highlighting the importance of moving fast - taking action.
- Eliminating duplication.
- Buying commercial products and services.
- Encouraging fixed price contracts.
- Emphasis on competition and innovative new entrants.
- Reducing bid protests.

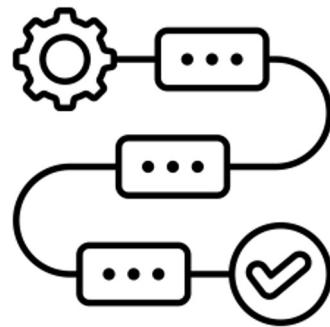
# Where We Are

- Phase I is complete.
  - 49 Model deviations prepared.
  - GSA has issued all 49 deviations and made them effective.
  - Eliminated 2,724 “must do’s”.
- Ready to begin Phase II.

# KeyChanges



**Plain Language**



**Streamlined  
Procedures**



**Restructured Rule  
Book**

# FAR Part 8: Required Sources of Supply

- FSS ordering procedures moved from the FAR to GSA's FAR Supplement.
  - Major streamlining, including permitting single award BPAs over \$100 million.
  - New “Required Use” Category of Contracts (RFO 8.104).

# FAR Part 12: Acquisition of Commercial Products and Commercial Services

- All Commercial Procedures Moved to Part 12 (RFO 12.201-1) including simplified commercial procedures up to \$9 million.
- Part 13 is now for non-commercial simplified procedures.
- RFQ Flexibilities (RFO 12.203(c)(2)) – COs have wide flexibility in how they evaluate quotations.
- Part 14 and 15 rules don't apply - no requirement for evaluation plans, scoring, or competitive ranges before communicating with vendors or requesting revised quotes.

# FAR Part 15: Contracting by Negotiation

- Discussions are OUT - Negotiations are IN.
- Competitive Range Flexibility (RFO 15.204-1(a)).
- “Proposals best suited for further negotiation” instead of “all of the most highly rated proposals.”

# FAR Part 16: Types of Contracts

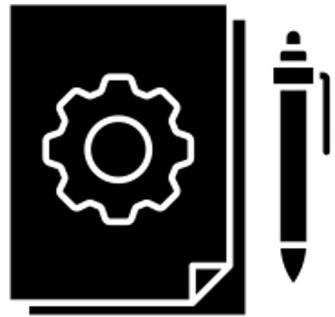
- Use of Innovative Contract Types (RFO 16.101(a)), for example Consumption-based Contracting (FC 16.2).
- BPAs Allowed under IDIQs (RFO 16.507-2(c)(3)).
- On and Off Ramps Officially Recognized (RFO 16.504-4).

# FAR Part 19: Small Business

- Rule of Two Clarity (RFO 19.111-2)
  - Rule of Two continues to apply to contracts.
  - Rule of Two remains discretionary for orders.
- 8(a) Competition Requirement (RFO 19.108-7(d))
  - Required to compete 8(a) requirements among approved govt-wide contracts before going sole-source even under competitive thresholds.
- Automatic 8(a) Release (RFO 19.108-11)
  - No SBA approval to release a requirement from 8(a) program if the follow-on will be set-aside to HUBzone, SDVOSB, or WOSB programs.

# What comes next?

## Phase II



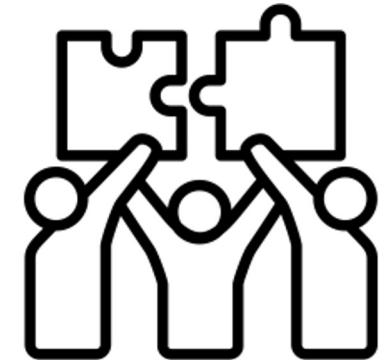
**Full rule-making cycle over next 12 months.**



**Several proposed rules.**



**Revolutionary GSAR Overhaul.**



**Need for cultural changes.**

# Help Needed from the GovCon Community

- Community Readiness.
- Operate in a world of greater CO discretion.
- Strategic Acquisition Guidance
  - FAR Companion: Discretionary practices.
  - Practitioner Albums: Use cases and deep dives.
  - Category Guides: Sector-specific buying tips.

# Questions?

A professional portrait of a man with light brown hair, smiling. He is wearing a dark suit jacket, a light blue dress shirt, and a yellow, blue, and white plaid tie. The background is a plain, light-colored wall, and a portion of the American flag is visible on the left side of the frame.

**Jeff Koses**  
Senior Procurement Executive  
U.S. General Services Administration  
**Email:** [jeffrey.koses@gsa.gov](mailto:jeffrey.koses@gsa.gov)