

Focus Points: Key Changes to FAR Part 3

FAR Part 3 language has been updated throughout for clarity, though substantively most requirements remain unchanged.

Focus Points

- Revisions continue to place emphasis on proactive identification and mitigation of conflicts of interest, and robust internal compliance programs and reporting channels.
- FAR 3.907 Whistleblower Protections Under the American Recovery and Reinvestment Act (ARRA) of 2009 was removed. This section previously outlined whistleblower protections for contractor employees under the ARRA, which is no longer in effect.

Watch Items

Prior to current FAR overhaul efforts, the FAR Council issued a [Proposed Rule](#) under FAR Case 2023-006 (dated January 15, 2025) that included [substantial changes to Organizational Conflict of Interest \(OCI\) rules](#). While the current FAR overhaul text does not implement these changes, per the accompanying [FAR Part 3 Practitioner Album](#), this content will be addressed in subsequent policy and practitioners should continue to monitor developments for potential impact.

For Detailed Redline Analysis and Practical Guidance: Visit our full annotated document and insights section for clause-by-clause breakdowns and practitioner-focused commentary.