



U.S. Small Business  
Administration

# Small Business Regulatory Impact

**40<sup>th</sup> Marshall Small Business Alliance**

**NASA Marshall Space Flight Center**

**September 25, 2025**

# Legislative Action

## Introduced in the House

- [H.R.2804](#) (Velazquez) – Amend the SB Act to codify the Rule of Two

## Introduced in the Senate

- [S.2656](#) (Markey) – Codify the Rule of Two

# **SBA Regulatory Action**

# SBA Proposed Rule: Small Business Size Standards

[90 FR 41168](#) (Aug. 22, 2025)

- Proposes to increase its monetary based small business size definitions (commonly referred to as “size standards”) for 263 industries (259 receipts based and four assets based (financial institutions)).
- Proposes to retain receipts based size standards for 237 industries and 12 subindustries (“exceptions”) and remove one exception for 488510 Non-Vessel Owning Common Carriers and Household Good Forwarders.
- SBA also invites comments on its proposed policy of not lowering any size standards, except for excluding dominant firms from qualifying as small.
- Public comment period ends Oct 21, 2025.

# **FAR**

# **Regulatory Action**

# **FAR Final Rule:** Clarification of System for Award Management Preaward Registration Requirements

[90 FR 38206](#) (Aug. 7, 2025)

- Offeror must be registered on Sam.gov at time of offer submission and at time of contract award but not required to be registered in between those two points in time.

# FAR Final Rule: Threshold Increases for FY26 (Effective Oct. 1)

[90 FR 41872](#) (Aug 27, 2025)

Description	Current Threshold	Proposed Increased Threshold
Micropurchase threshold	\$10,000	\$15,000
Simplified Acquisition threshold	\$250,000	\$350,000
8(a) justification threshold for civilian-agency sole-source awards to entity-owned participants and certain other sole-source awards	\$25 million	\$30 million
Prime contractor subcontracting plan threshold	\$750,000 (\$1.5 million for construction)	\$900,000 (\$2 million for construction)
8(a), HUBZone, WOSB sole-source threshold	\$4.5 million (\$7 million for manufacturing)	\$5.5 million (\$8.5 million for manufacturing)
SDVOSB sole-source threshold	\$4 million (\$7 million for manufacturing)	\$5 million (\$8.5 million for manufacturing)

# Revolutionary FAR Overhaul (RFO)

# FAR Overhaul

- [FAR Part 1](#) - Emergency Acquisitions ([Practitioner Album](#)) – Submit Public Feedback [Here](#) – Due **September 30, 2025**
- [FAR Part 4](#) - Administrative and Information Matters ([Practitioner Album](#)) – Submit Public Feedback [Here](#) – Due **October 14, 2025**
- [FAR Part 8](#) - Required Sources of Supplies and Services ([Practitioner Album](#)) – **Submit Public Feedback [Here](#) – Due **October 14, 2025****
- [FAR Part 9](#) – Contractor Qualifications ([Practitioner Album](#)) – Submit Feedback [Here](#) – Due **October 6, 2025**
- [FAR Part 12](#) – Acquisition of Commercial Products and Commercial Services ([Practitioner Album](#)) – Submit Feedback [Here](#) – Due **October 14, 2025**

# FAR Overhaul

- [FAR Part 28](#) – Bonds and Insurance ([Practitioner Album](#)) – Submit Public Feedback [Here](#) – Due **October 14, 2025**
- [FAR Part 30](#) - Cost Accounting Standards Administration ([Practitioner Album](#)) – Submit Public Feedback [Here](#) – Due **October 14, 2025**
- [FAR Part 33](#) - Protests, Disputes, and Appeals ([Practitioner Album](#)) - Submit Public Feedback [Here](#) – Due **October 6, 2025**
- [FAR Part 34](#) -Major System Acquisition ([Practitioner Album](#)) - Submit Public Feedback [Here](#) – Due **September 30, 2025**

# FAR Overhaul

- [FAR Part 38](#) – Reserved ([Practitioner Album](#)) - Submit Public Feedback [Here](#) – Due **October 14, 2025**
- [FAR Part 46](#) – Construction and Architect-Engineer Contracts (A-E) ([Practitioner Album](#)) - Submit Public Feedback [Here](#) – Due **October 6, 2025**
- [FAR Part 48](#) – Value Engineering ([Practitioner Album](#)) - Submit Public Feedback [Here](#) – Due **October 14, 2025**
- [FAR Part 51](#) – Reserved ([Practitioner Album](#)) - Submit Public Feedback [Here](#) – Due **October 14, 2025**

# RFO Impact

# FAR Overhaul

- [FAR Part 6](#) – Competition Requirements
  - Explicit references to socioeconomic set-asides removed and replaced with references to FAR 19 (not overhauled yet)
    - Clarifies competition requirements and roles of acquisition team
    - “Contracting officers may set aside acquisitions for small business concerns. This authority also includes—
      - (a) Contract actions conducted under the Small Business Innovation Research (SBIR) and Small Business Technology Transfer (STTR) programs.
      - (b) Contract actions set aside for specific small business socioeconomic categories (see part 19).”

# FAR Overhaul

- [FAR Part 10](#) – Market Research
  - No longer list specific market research considerations or techniques; Competition in Contact Act preserved; policy and procedures combined (**removed reference to small business**), procedures not required by statute move to companion guide; consolidation and bundling removed, found redundant to FAR Part 7; disaster relief purchasing removed, found redundant to FAR Part 26

# FAR Overhaul

- The Federal Supply Schedule (FSS) was exempt from FAR 19 Small Business Programs prior to the FAR Overhaul and the FAR Overhaul maintains that exemption.
- [Revolutionary FAR Overhaul Part 8.4](#) – Orders under the Federal Supply Schedule
  - 8.401(b) states “agencies must follow the ordering procedures established by GSA and found at subpart 538.71.
- [Ordering under the Federal Supply Schedule](#)
  - 538.7102-1 FSS program. (b) Unless otherwise prescribed, FAR parts 5, 6, 14, 15, 16, and 19 do not apply to this subpart.
  - 538.7102-2 Placing FSS orders and establishing FSS BPAs.
    - (c) Ordering activities may—
      - (1) Set aside, reserve or otherwise place orders or establish FSS BPAs with small business concerns identified in FAR part 19.

# Executive Order (EO)

- [Eliminating Waste and Saving Taxpayer Dollars by Consolidating Procurement](#)
  - Returns GSA to its original purpose from 1949
  - Within 60 days, Agency heads must submit proposals to consolidate common goods/servs; GSA plan due in 90 days
  - The EO requires agencies to have GSA “conduct domestic procurement with respect to common goods and services for the agency.”

# Impact of FAR 8.4 Overhaul and EO

- More acquisitions moved to the Federal Supply Schedule means:

- **Reduced** opportunities for U.S. small business



- **Decreased** competition,



- **Increased** total life cycle costs, and



- **Endangered** continuity of supply (i.e. reduced infrastructure and industrial base)

# SBA Links

# New Websites and Guides

- MySBA Certifications
  - <https://certification.sba.gov/>
- Small Business Search is live (replaced DSBS)
  - [Small Business Search](#)
  - [Small Business Search Help Guide](#)
- GOVCON Match
  - [GovCon Match](#)

# SBA Manufacturing Links

- [Make Onshoring Great Again portal](#):
  - Contains information on onshoring manufacturing back to the U.S.
- [Cutting Red Tape for Small Manufactures](#):
  - SBA's Office of Advocacy helps small business manufacturers with regulatory concerns
  - [Report Burdensome Regulations](#) by online form, email ([redtape@sba.gov](mailto:redtape@sba.gov)) or phone (800-827-5722)
- [Empower to Grow](#):
  - provides eligible U.S. small businesses with free business courses, tailored training, and one-on-one consulting

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