



COMPARISON OF REPORTS PROPOSING CHANGES TO THE U.S. ABILITYONE PROGRAM (2013-Present)

	Suggestions to Change the AbilityOne Program	OIG Report June 4, 2019	NCSE 898 Panel Presentation May 2, 2019	DoD Proposed Rulemaking Apr. 2019	NCD Report Feb. 2019	Draft Changes to A1 Regulations	OIG Report Dec. 2018	NCD Report Oct.16, 2018	Small Enterprise Set Aside Proposal Oct. 10, 2018	Senate HELP Committee Report Oct. 2018	GAO Report Sept. 2018	898 Panel Report July 2018	Advisory Committee Report Sept. 2016	GAO Report May 2013
1	JWOD Not Consistent w/ WIOA & CIE				X			X	X	X	X		X	
2	Update/Reform/Amend JWOD				X			X		X		X	X	X
3	Amend A1 Regulations (41 CFR 51)					X						X		
4	Develop Separate Part in the FAR, in addition to FAR Subpart 8.7, that Details How to do Business with AbilityOne											X		
5	Erosion of JWOD Statutory Authority (e.g., VBA)	X					X							
6	Allegations of Fraud and Violations of Law within the AbilityOne Program	X												
6	Reform the Role of the CNA								X					X
7	Restrict Use of CNA Fees for Lobbying				X				X			X		X
8	CNA Lack Accountability/Oversight								X					X
9	Maintain JWOD Solely as a Training Program								X					
10	Phase Out FLSA Section 14(c)				X				X				X	
11	Increase Competition/Re-Competition		X	X		X			X			X	X	
12	Commission Authority to Transfer/Recompete Work Due to Marginal or Poor Performance					X			X					
13	Inclusion of Veterans Disabled under the VA								X			X		
14	Accepting Disability Documentation from Other Agencies (e.g., VA, Social Security)								X			X	X	
15	Stricter Requirements on NPAs for Documentation and Disability determinations											X		
16	Use AbilityOne Program Participant 'mapping' Against Established Disability Employment Programs (e.g., Vocational Rehabilitation and Employment Services/Compensated Work Therapy/Wounded Warrior programs, etc.) in Order to Enable NPA hiring for AbilityOne											X		
17	Develop a goal for Veterans to be Integrated into the Workforce Through Internships, Part-time, or Full-Time Employment Opportunities. Special consideration should be given to Veterans Living with Mental Illness or Physical Disabilities to Help Them Secure and Maintain Community Based Competitive Employment											X		
18	Create Incentives for Inclusion and Mentoring of Smaller Nonprofits and Veteran Employment Opportunities on DoD Contracts											X		
19	Lower Agency Ratio		X	X					X			X	X	
20	Lower Direct Labor Ratio to at Least 15 % and at Most 50 % of Hours of Total Direct Labor Hours Worked											X		
21	Allow Indirect Labor Positions to be Included in the Agency Ratio Calculation		X									X		
22	Allow the Eligible Veteran that Participate in VA's Vocational Rehabilitation and Employment (VR&E), Compensated Work Therapy (CWT) and the Military Services Wounded, Ill, and Injured and other Appropriate Programs to Participate in the AbilityOne Direct Labor Ratio											X		
23	Enhance Program Transparency & Oversight (e.g., Audits, Compliance Manual)	X			X		X		X			X		X
24	Increased Transparency in Contract Recommendation/Selection Process (i.e., the process should include mandatory criteria and certifications)		X									X		X
25	Technical Criteria Must be Developed in Collaboration with the Requiring Activity and Must Contain Order of Importance and/or Weights of the Criteria											X		



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26	Identify Announcement Process Similar to FEDBIZOPPS and Electronic Proposal Submittal Process so All Interested NPAs in the AbilityOne Network May Apply to Participate in the Specified Procurement											X		
27	CNAs Should Not be Included in the Process of Awarding Contracts							X					X	
28	Commission to Issue Policy Establishing Mandatory Source Selection Procedures that CNAs will follow											X		
29	Build a Centralized Database on Pricing											X		
30	Require Fair Market Pricing Documentation and Prevailing Wage Documentation in Contracts and Negotiation Processes Between CNAs and NPAs.											X		
31	Modify PL Allocation Process		X			X						X		
32	Requiring Detailed Documentation for Each Phase of the Recommendation and Allocation Process to Ensure Transparency in the Acquisition Process; Especially the Step When the Finance SMEs Conduct Evaluations of the NPAs											X		
33	Make the AbilityOne Procurement List Information Management System (PLIMS) Available to DoD Contracting Personnel to Check Status of Contracts, Decision Documents, and other Pertinent Information											X		
34	Require Best Value Trade-Off Analysis Process that Considers Price, Size of NPA, Technical Capability, Past Performance, Percentage of Disable Hours, Percentage of Veteran's Hours, Percentage of work in the AbilityOne Program, etc.											X		
35	Establish Penalties if a CNA or NPA Does Not Follow Policies and Procedures.											X		
36	CNA Must Write a Detailed Justification When Deviating from the Technical Evaluation Team's NPA recommendation											X		
37	CNA Require Use of the Requiring Activity's SMEs as a Part of the Technical Evaluation Team in Policies and Procedures											X		
38	Final Documentation that is Submitted to the Commission for NPA Selection Should Contain All Technical, Financial and Cost/Price Revaluations, Rather Than Just an Abbreviated Version of the Recommendation Authority's Decision Document											X		
39	Change Allotted Timeframe When Adding Products or Services to the Procurement List from 60 Days to 30 Days - One Public Comment Period of 30 Days with Addition to PL Effective Immediately After Approval											X		
40	Commission to Authorize and Undesignate/De-authorize CNAs and NPAs as the Authorized Source on the Procurement List to Accept Contracts from Contracting Activities for the Furnishing of Specific Products and Services on the Procurement List											X		
41	Increase Career Path Opportunities for Persons with Disabilities			X	X							X	X	
42	Study the Need for and Benefits of Defined Vocational Goals/Assessments For all AbilityOne NPAs											X		
43	Establish an AbilityOne Commission Eligibility and Employment 'cell' of Qualified Personnel who are Occupational Therapists, Vocational Rehabilitation Counselors (VRCs), and Licensed Clinical Social Workers, and other similar qualifications.											X		
44	Change the Definition/Term "Significantly Disabled"		X	X	X			X				X		
45	Revise the Definition of "Severely Disabled Individual", so it does not state that Participants are "Unable to Engage in Competitive Integrated Employment" to Allow the VA (VRE/CWT) and VR to Refer Veterans to Participating AbilityOne NPAs		X									X		



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46	Right of Refusal Workforce Policy for Transfers					X						X		
47	Previously Designated NPA Required to Disclose Necessary Personnel Records and Allow the Successor NPA to Conduct On-Site Interviews with those Identified Employees, who are Potentially Qualified for Positions Under the Successor Contract											X		
48	Modify Contract Dispute Processes					X						X		
49	Require NPA/CNA Affiliation Agreements	X			X	X								
50	Increased Enforcement & Management of CNA Cooperative Agreements				X		X							
51	More Resources at the Commission Level						X					X		
52	Increase Number of AbilityOne Commissioners						X							
53	More Education about AbilityOne						X					X		
54	DoD-wide Policy Memo Emphasizing the Importance and Establishing a Goal for Growth in AbilityOne Program Participation, As Well As Requiring the Use of AbilityOne Representatives (e.g., Air Force Memo Subject: AbilityOne Representative (ABOR) Nomination dated August 31, 2017)											X		
55	Require DoD Contracting Officers to Check Procurement List											X		
56	Defense Acquisition University (DAU) Must Continually Update U.S. AbilityOne Training		X									X		
57	Outside (VA/State/contracted) IEE Submissions should be Accepted/Encouraged, as Feasible		X									X		
58	Develop a Certification/Validation Program for Individuals Certifying the IEE form and Contract For Eligibility Assessment of Individuals whose IEE is not Provided by the VA or a state vocational rehabilitation agency		X									X		
59	Implementation of Better/User-Friendly Technology & Establishing an Enterprise-wide Risk Management Framework		X				X					X		X
60	Update the Online Procurement List (PL) to Reflect Detailed Information and Improve the Search Functions to Enable a More User-Friendly Interface											X		
61	Contracting Systems Across DoD be modified to Add "Flagged Checkpoints" Requiring the Contracting Officer to Ensure Mandatory Sources (AbilityOne Program) Have Been Searched Before the Order can be Processed											X		
62	Service Providers Should Not Also Act as Employers				X			X	X				X	
63	JWOD Should Evolve to Focus on Industries of the Future.			X				X						X
64	Incorporate Section 508 of the Rehabilitation Act of 1973 to Include Training for Contracting Personnel to Ensure Access For People with Physical, Sensory, or Cognitive Disabilities Technologies Developed, Procured, Maintained, or Used by Federal Agencies											X		
65	WIOA Should not be Reopened							X						
66	Create Small Business Priority for Entities Owned by OR Hiring People with Disabilities			X				X	X				X	