

U.S. AbilityOne Commission
Minutes – Quarterly Public Meeting
Thursday, July 21, 2022
1:00 p.m. – 4:00 p.m. ET

I. Call to Order and Introductions

U.S. AbilityOne Commission Chairperson Jeffrey Koses called the meeting to order at 1 p.m. and greeted the approximately 270 participants attending via Zoom.

Commission Executive Officer Angela Phifer gave administrative remarks. She noted that two American Sign Language interpreters would interpret, and that the meeting was being live captioned.

Commission members, Commission staff, and the CEOs of National Industries for the Blind (NIB) and SourceAmerica – the Central Nonprofit Agencies (CNAs) – introduced themselves.

II. Consideration of Minutes

There were no changes to the minutes from the virtual public meeting on February 10, 2022. Commission Vice Chairperson Chai Feldblum moved to approve the minutes. Commission private citizen member Bryan Bashin seconded. The motion passed.

III. Chairperson Opening Remarks

Mr. Koses said the Commission is “on the march” with its [FY 2022-2026 Strategic Plan](#) finalized on June 30, 2022; the final [rule](#) published July 21, 2022 titled “Prohibition on the Payment of Subminimum Wages Under 14(c) Certificates as a Qualification for Participation as a Nonprofit Agency Under the Javits Wagner O’Day Act”; and [Commission Policy No. 51.542](#) (“Nonprofit Agency Use of AbilityOne Products in the Performance of AbilityOne Service Contracts”) now in place.

Commission usually has a public meeting every quarter, but in the previous quarter the agency instead held a Town Hall for NPA CEOs and a Listening Session for disability advocates to review the Commission’s then-draft strategic plan.

August 13, 2022, was one-year anniversary of the four private citizen members’ appointment to the Commission. In that time, they have made historic contributions, including the Strategic Plan and the rule.

Also in July 2022: the 32nd anniversary of the Americans with Disabilities Act (ADA). Mr. Koses called the ADA a major milestone in America’s quest to build a more equitable society, and said the ADA was both a victory and a vow, affirming the rights of people with disabilities and establishing a channel for upholding those rights.

Commission Issues Final Rule: “Prohibition on the Payment of Subminimum Wages Under 14(c) Certificates as a Qualification for Participation as a Nonprofit Agency Under the Javits Wagner O’Day Act”

Mr. Koses said that, for years, “one of the loudest and fairest criticisms of the AbilityOne Program” had been its use of 14(c) certificates. In his first months as interim and then permanent chair, it was the issue he heard the most about.

After the Commission published the proposed rule in the Federal Register on October 12, 2021, for public comment, more than 180 comments were received in response. The Commission carefully reviewed these and used them in finalizing the [rule](#).

He thanked the people who worked on the rule, including Dave Berthiaume from Dept. of Labor’s Office of Disability Employment Policy.

New Commission Policy on NPAs Buying AbilityOne Products

Regarding [Commission Policy 51.542](#) (“Nonprofit Agency Use of AbilityOne Products in the Performance of AbilityOne Service Contracts”), signed on July 20, 2022, Mr. Koses said:

- By adding a product to the Procurement List (PL), the Commission is affirming that the product is high quality and reasonably priced for the Government customer. It follows that the product is also high quality and reasonably priced for NPAs.
- It is time for everyone in the Program to show they completely support the Program. Doing so will help create and sustain jobs.

Compliance and Technical Assistance

Mr. Koses observed that, for the public engagement session later in the meeting, the Commission had [invited](#) public comments or suggestions regarding the types of technical assistance that may be provided to AbilityOne-participating nonprofit agencies during future compliance inspections or regulatory assistance visits.

Compliance shows investments in the Program produce the intended results. Assistance is also important. To be successful, NPAs must have clarity on expectations.

IV. Guest Speaker: Dr. Mona Minkara, Northeastern University

Introduction

Before introducing Dr. Minkara, Mr. Bashin said the publication of the rule was a historic day.

He then introduced Dr. Minkara, who is an Assistant Professor in the Department of Bioengineering and an Affiliate Faculty in the Department of Chemistry and Chemical Biology

at Northeastern University , where she heads the COMBINE (Computational Modeling for BioINterface Engineering) Lab. Mr. Bashin mentioned some highlights of [her life story](#).

Dr. Minkara Remarks

Dr. Minkara, who is blind, said she grew up with the ADA, which became law when she was three years old. She remembers being baffled when she realized that not every country has an ADA. She is not sure she could have achieved what she has achieved without the ADA.

While her path has not always been smooth—for example, a doctor once told her parents it was not worth spending a cent on her education—she has had the ADA to depend on. Her parents, Lebanese immigrants, sent her to public schools. In 10th grade, a teacher discouraged her from enrolling in advanced biology, but Mona insisted that it was her right to do so. Because of the ADA, she got the support she needed. Rather than fail, as the teacher had predicted, young Mona got the highest grade in the class. That experience shifted her perceptions of her own abilities.

She attended Wellesley College, and while the school wasn't initially sure how to accommodate her, the ADA motivated them to figure it out. She did well and gave the commencement speech. For graduate work, she chose University of Florida, because it prioritized accommodating her.

After she received her Ph.D. in Chemistry, the University of Minnesota's Professor J. Ilja Siepmann recruited her, saying, "Because you are blind, you are going to solve scientific problems no one else can, because you think outside of the box." This comment made her realize that blindness can be advantageous. Following that epiphany, she secured her current job at Northeastern. The ADA enables her to say what accommodations she needs to do her job.

Her experiences have inspired her to work to make the world more accessible, a goal she has pursued partly by traveling around the world and exploring accessibility in different locales. She has also been part of a group working to make space travel more accessible. She also has a website, monaminkara.com, where people can reach out to her.

V. Briefing on the FY 2022-2026 Strategic Plan.

Ms. Feldblum conducted the briefing.

She observed that, when the AbilityOne Program was founded in 1938, the assumption was that people who are blind could not get jobs in the regular economy. Now the belief is very different, she said, and the Commission's FY 2022-2026 Strategic Plan reflects the new reality.

Differences between Draft Strategic Plan (published March 18, 2022) and final Strategic Plan

Comments submitted in response to the draft plan prompted the Commission to make changes that were reflected in the final plan, Ms. Feldblum said.

Of particular note, the Draft Strategic Plan's first strategic objective, "Expand competitive integrated employment (CIE) for people who are blind or have other significant disabilities,"

attracted comments suggesting that the 75 percent direct labor hour requirement specified in the Javits-Wagner-O'Day (JWOD) Act (the Program's enabling legislation) is incompatible with competitive integrated employment.

To address this issue, the final Strategic Plan replaced that draft plan objective with two objectives:

1. Transform the AbilityOne Program to expand competitive integrated employment (CIE) for people who are blind or have significant disabilities.
2. Identify, publicize, and support the increase of good jobs and optimal jobs in the AbilityOne Program.

Objective 1 will be up to Congress, but the Commission will share thoughts with Congress on how to achieve it, Ms. Feldblum said.

With regard to Strategic Objective 2, "Identify, publicize, and support the increase of good jobs and optimal jobs in the AbilityOne Program," she discussed the Strategic Plan's [definition of good jobs and optimal jobs](#).

She mentioned the importance of the "publicize" part of Strategic Objective 2 – which will change the stereotypes of the Program, she said. She also emphasized the "support" part: The Commission will support NPAs in their effort to create more "good jobs" where possible.

The draft plan's Strategic Objectives 2 and 3 became the final plan's Strategic Objectives 3 and 4 with slight wording changes.

VI. Commission Subcommittee Reports

Enterprise Risk Management Subcommittee

Report delivered by Commission Member Virna Winters, Subcommittee Chairperson and the Director for Acquisition Policy and Oversight in the Office of Acquisition Management, Department of Commerce.

The Commission continues to work diligently to mitigate 32 risks within its risk profile.

Overall risk profile is "moderate."

Commission planned to use resources requested in FY 22 budget request to support mitigation but did not receive the full requested funding in its FY 22 appropriation.

Commission briefed Congressional appropriators in June on needs, and hopes to receive funding in the FY 2023 budget to support risk mitigation efforts.

Now that Strategic Plan is done, Commission staff will conduct risk assessment of 29 performance outcomes identified in the plan, and will update its risk register for FY 2023.

Performance Management Subcommittee

Report delivered by Commission private citizen member Christina Brandt, subcommittee member.

One of her first tasks for the subcommittee was providing feedback to Acting Executive Director Kim Zeich – great opportunity to commend Ms. Zeich on her work with the new Commission members, and to discuss accessibility.

Subcommittee worked on the Strategic Plan, and looks forward to ensuring its outcomes are measured.

Policy and Regulations Subcommittee

Report delivered by Ms. Feldblum, Subcommittee Chairperson.

14(c) Regulation was published July 21; effective October 19, 2022.

- Prohibits use of 14(c) certificates to pay employees on AbilityOne new contracts, extensions of contracts, options.
- NPAs may request an extension of up to 12 months to reach compliance.
- Deadline for requests for extension: by Sept 19, 2022.
- During extension period, NPA will not be awarded new PL additions, absent exigent circumstances and a written request from the Federal customer.
- Ms. Feldblum thanked Dept. of Labor’s Dave Berthiaume as well as the Commission’s Acting Executive Director Ms. Zeich, General Counsel Marlin Paschal, and Assistant General Counsel Steven Jones-Ellard for their work on the rule
- Committee will work on competition regulation next.

Planned policy work stemming from Strategic Plan:

- Ensure Cooperative Agreements reflect Strategic Plan
- Publish Request For Information (RFI) on “good jobs” and “optimal jobs” in Program, review responses.
- Revise Individual Eligibility Evaluation (IEE) process and form to better enable job customization and employment advancement.

VII. Acting Executive Director Report

Ms. Zeich welcomed Director of Business Operations Amy Jensen back from her 10-month studies at the National Defense University's Eisenhower School for National Security and Resource Strategy. Ms. Jensen will serve as the Commission's Acting Deputy Executive Director and will support the implementation and monitoring of the Strategic Plan.

Ms. Zeich noted that many members of the staff—including Shelly Hammond, Director of Contracting and Policy— have supported the ongoing update of Commission policies.

Commission efforts to enhance communication and transparency included:

- Town Hall and listening sessions during development of Strategic Plan.
- Listening sessions are ongoing.
- Commission Chairperson remarks at ACCSES conference.
- 2 Commission staff sessions at the CEO forum hosted by the National Council of SourceAmerica Employers (NCSE).
- That totals 5 significant engagement events in 10 days (including July 21 public meeting).
- Commission regularly updates website, and is now increasing social media presence.

Recent Procurement List (PL) additions highlight post-pandemic direction and focus on knowledge-based work. Additions include:

- Third-party logistics–type contract where a nonprofit will stock and distribute PPE for Dept. of Homeland Security.
- Acquisition Support Services to U.S. Coast Guard
- Section 508 Compliance Assurance

Commission's compliance team is focused on strengthening and enhancing compliance program, including making sure guidance is clear.

VIII. Presentation by Acting Inspector General

Stefania Pozzi Porter, Commission Acting Inspector General, provided an update on the activities of the Commission's Office of Inspector General (OIG), including:

- [Duties and mechanisms of the OIG.](#)
- How issues are referred to OIG for investigation.
- OIG currently has 28 ongoing investigations. Frequent issues include misrepresentation of labor ratio, conflict of interest, employee misconduct.
- [Recently completed audits](#) include:

- CNA Selection of NPAs for Project Assignment and Allocation of Orders. Among other findings, this performance audit concluded that the CNAs’ distribution process could be improved with updated guidance and additional oversight from the Commission. The audit also recommended improved Commission controls over CNAs and project distribution processes.
- [OIG ongoing audits](#)
- [OIG reports](#)
- [OIG FY 2022 Objectives](#)

IX. Advancing Nonprofit Agencies’ Purchases of Procurement List Items

The CEOs of the CNAs -- Kevin Lynch, President & CEO of National Industries for the Blind (NIB), and Richard Belden, President and CEO of SourceAmerica -- discussed actions aligned with [Commission Policy 51.542](#).

Mr. Lynch [summarized](#) NIB’s collaborations with SourceAmerica and its NPAs, and next steps.

Mr. Belden [discussed](#) initiatives to support implementation of the policy, and next steps.

X. Compliance and Technical Assistance Overview

Mr. Koses said that the Commission had [invited](#) public comments or suggestions regarding the types of technical assistance that may be provided to AbilityOne-participating nonprofit agencies during future compliance inspections or regulatory assistance visits.

The goals of the compliance and technical assistance visits are to ensure that the AbilityOne Program produces the intended results, for both Federal customers and employees.

When discussing compliance, Mr. Koses said he was not just talking about the direct labor ratio, but about how the terms and conditions of the contract are being met.

With regard to technical assistance, the Commission is interested in the NPAs being successful, Mr. Koses said. The Commission wants to know: What do the NPAs need from the CNAs, from the Commission, to be successful?

Compliance and Technical Assistance Overview

John Konst, the Commission’s Director of Oversight and Compliance, gave an [overview of the existing framework](#) and noted that the focus is not currently on contract performance, job customization or extensive analysis of placement outcomes.

Representatives of NIB and SourceAmerica then gave an overview of the CNAs’ involvement in technical assistance.

Ms. Angela Hartley, Executive Vice-President of NIB

She discussed NIB's technical assistance, including productivity engineers (who help NPAs with safety, efficiency improvements, and more); financial support; technical assistance and training to prepare NPAs for Commission's compliance visits; and leadership training.

NIB also commissioned the development of a Social Security Disability Insurance (SSDI) toolkit that it provided to NPAs to provide to their employees.

Mr. Shane Kanady, Vice President of Workforce Development at SourceAmerica

He discussed SourceAmerica's workforce development support programs, including the Quality Work Environment (QWE) initiative; 14(c) transition program; participation with the Department of Labor's NEON initiative; customized and supported employment; productivity engineering; Inclusive Certification Programs; Direct Service Professional Certifications; and SourceAmerica Academy Training.

XI. Public Engagement: Compliance and Technical Assistance Overview

Ms. Jensen facilitated the public engagement section of the meeting.

Ms. Borgi Beeler, President and CEO, Kalix and MVW Services, Inc., Minot, North Dakota

Ms. Beeler is on the Executive Committee of the NCSE and is also CEO of MVW Services, an AbilityOne-participating NPA.

She complimented Dr. Minkara's presentation but pointed out that not everyone can earn a Ph.D.

She said it is important to give employees opportunities to advance, but also important to support those who wish to remain in their current jobs. She is concerned that an upward-and-outward focus for Program jobs might be interpreted as not allowing long-term employment.

In May, NCSE submitted a few requests for assistance with regulatory compliance:

- 1) Requested acceptance of stamped or typed signatures – this was addressed in FAQs updated in May 2022.
- 2) Requested acceptance of medical documentation in languages other than English – this was addressed in a verbal presentation at SourceAmerica's May conference.
- 3) Requested clear identification of qualifications required for specific diagnosis – this was addressed in a verbal presentation at SourceAmerica's May conference.

- 4) Requested a portal to upload documentation of disability to Commission website in order to obtain advance approval or acceptance from the Commission. Ms. Beeler's understanding is that this portal will be implemented as a voluntary option.
- 5) Requested more detailed instructions for both medical documentation and the IEE form. Must have more comprehensive written instructions (whether called a manual or FAQs or guidelines) so that AbilityOne contractors can train their staff.
- 6) When a piece of documentation does not meet criteria for a technical reason but the underlying disability is not in question, NCSE requests the NPA receive a warning and grace period for correction of the documentation, rather than being required to adjust ratios retroactively. A reviewer should present findings along with suggested corrections, and allow opportunity for immediate correction.
- 7) Requested an appeal process.

Following Ms. Beeler's remarks, Mr. Koses asked if she could talk about how the current system impacts NPAs and how the requested changes would relieve that burden.

Ms. Beeler said that, for example, if there is some minor technical issue with the documentation for employees who have disabilities, instead of getting an opportunity to get the documentation corrected, the NPA has to go back and retroactively reclassify those employees as non-disabled, which may mean the NPAs falls out of compliance because of the ratio. That process is time-consuming and very stressful for NPA staff. Additionally, it can be hard to get the documentation corrected because the guidance is insufficiently detailed.

Ms. Feldblum pointed out that as part of the Strategic Plan, the Commission will be looking again at the documentation of disability and at possibilities for streamlining the process.

Regarding Ms. Beeler's concern about long-term employment, Ms. Feldblum says nothing in the Strategic Plan dictates that employees will be pushed out of jobs they want to keep. Rather, the requirement is for NPAs to have a system for robust conversation about employees' work options.

Commission private citizen member Gabe Cazares asked Ms. Beeler to be sure to send her points in writing, so the Commission could discuss them.

Bruce Patterson, CEO of ServiceSource

Mr. Patterson noted that negative coverage of the AbilityOne Program by CNN in 2015, which he called unsubstantiated, chilled Program growth and encouraged detractors. RSA sub-regulatory guidance issued in 2016 has also had damaging effects.

Every NPA Mr. Patterson has encountered has taken compliance extremely seriously.

The JWOD definitions of “other severely handicapped” and “significantly handicapped individuals” are idiosyncratic. And in 2003 the Interagency Committee on Disability Research documented some 67 different, often overlapping Federal definitions of “disability.”

Operationalizing disability criteria requires a determination of “disability,” “employability” and “place-ability.” This can be subjective. For many years, there has been a struggle to develop a valid, reliable objective measure that balances complexity and simplicity.

He suggests:

Redefine the definition of “significantly/severely disabled” to include to all other major statutory definitions.

Devise an official Commission form that requires an independent medical professional or specialist to provide a diagnosis, and address specific questions on an individual’s capabilities.

He is intrigued by the idea of an online portal on which NPAs might submit documentation, but that would be a massive undertaking and present difficulties regarding timeliness.

He understands that the Commission is focused on outplacement. He believes that outplacement from the Program is underreported. But there is no standard way to collect, document, and report that information. And there are technical questions, such as: Can NPAs count placements in which the employee, after a period of support, finds a new job on his/her own?

He said he would submit the remainder of his comments in writing.

With reference to Mr. Patterson’s mention of the CNN coverage, Mr. Koses observed that, in Federal acquisition, no sole source program is free from risk of fraud and bad actors, and that Commission’s OIG plays an important role in helping to build trust in AbilityOne.

Ms. Feldblum said the Commission is working on making the definition of disability easy and clear. She appreciates Mr. Patterson’s points about the issues surrounding outplacement data, but says the Commission will indeed be gathering that data from NPAs that are doing outplacement well, and will be incentivizing and supporting NPAs to do outplacement well.

Millisa Gary, GSA AbilityOne Program Executive and ABOR

Ms. Gary observed that AbilityOne’s employment mission is in itself a noble cause, but the Program must also keep pace with Federal customers’ evolving needs and provide total solutions.

As the Program moves to more complex contracts, ensuring customer satisfaction is critical. If Federal customers determine contract terms and conditions are not being followed and performance is sub-par, they will find other sources.

It is important to identify issues early, before they grow into problems. One way to do this is to expand compliance reviews to address contract performance.

A Pulse survey recently conducted at GSA, to discern contracting officers' satisfaction with AbilityOne vendors, suggested room for improvement, Ms. Gary said.

Technical assistance relative to contract performance and compliance must be a priority.

Mr. Koses pointed out that, while Ms. Gary has regular conversations with GSA organizations that are happy with AbilityOne contracts, she also has conversations with unhappy ones. He thanked her for her clear message about the importance of contract performance.

Returning to a previous theme in the discussion, Ms. Feldblum said no one is ignoring the 2015 CNN coverage or the AbilityOne Program's reputational issues. But the Strategic Plan offers a way to move beyond that.

Larysa Kautz, President and CEO, Melwood

Ms. Kautz said the new medical documentation requirements are not an easy lift, especially in the pandemic's wake. Doctors aren't easy to reach; there are waits for appointments; transportation and co-pays are hurdles. The new requirements are an administrative burden, too.

The penalties for nonconformance are swift and steep, and the review process doesn't allow for much context or deliberation. She doesn't know of any appeal process or cure period, even for a minimal miss.

Melwood's suggestions include a phase-in timeframe for compliance, an assessment of the administrative burden on NPAs, a cure period, and an appeals process.

Melwood is subject to numerous regulatory regimes and audits that create stress and heavy burdens for its staff. Melwood undergoes regular, deep-delving CARF audits. Resources directed to such administrative burdens are resources diverted from employees, training, and advocacy, and that's particularly taxing on smaller NPAs.

Could some of AbilityOne's considerations be handled by CARF, or could audits be otherwise combined?

All of Melwood's contracts include performance metrics and consequences for poor performance. So there are mechanisms that address performance.

Technical assistance with respect to quality and performance is very necessary.

It would also be good to share stories about good performance.

Mr. Koses asked Ms. Kautz if she could elaborate on where she saw opportunities for the Commission to rely on information produced by other agencies.

Ms. Kautz mentioned CPARs (Contractor Performance Assessment Reporting System), mechanisms for performance in the FAR space, CARF accreditations, the Air Force's information gathering.

William Sproule, of the Air Force, discussed CPARs and their appeals process.

Ms. Brandt discussed her NPA's experience with CARF, which she said had sometimes been positive, and sometimes not, with the surveyors not always having sufficient experience about, for example, CIE.

Robyn Slocum, Senior Program Manager, WISE (Washington Initiative for Supported Employment)

WISE is a training and technical assistance organization that focuses on technical assistance related to employment for people with more significant disabilities. They work with partners who have gone through technical assistance themselves.

Ms. Slocum says technical assistance must be customized, since each organization and person is different. The process requires understanding the organization's vision, communicating that vision, potentially building partnerships, benefiting from other organizations' lessons learned, and assessing and addressing gaps.

A good fit between job and employee is essential. A person with a disability who has low productivity in one contract might have greater productivity in another. Customization is key.

Terri Johnson, Director of Employment and Community-Based Services at The Resource Center (TRC), Jamestown, NY

Ms. Johnson's NPA had concerns related to documentation of disability – particularly policy changes related to medical providers being affiliated with NPAs. TRC includes a community health center, and the community has few other providers. Getting an outside provider might mean traveling to Buffalo, 90 minutes away, and there's no public transportation.

They appreciate the ability to use determinations from state and federal agencies (e.g., Social Security Administration), but that is not always as easy as it looks: Information doesn't always come from those sources in an acceptable format, for instance.

Making it all the harder to get timely, correctly formatted information from medical providers is that so many of them are facing staffing shortages these days. So it would be helpful if AbilityOne developed a streamlined form for documentation that could be given to a provider.

It would also be helpful for the NPAs to have a compliance manual.

Ms. Feldblum asked: If an individual has a document from another Federal agency that shows they have met that agency's disability determination, is there in fact any utility in requiring that that document also includes a diagnosis?

Ms. Johnson says that in TRC's experience, the documentation from Social Security and VR sometimes includes a diagnosis, and sometimes not, in which case AbilityOne won't accept it.

Julie Christensen, Executive Director, and Director of Policy and Advocacy, Association of People Supporting Employment First (APSE)

Ms. Christensen said "compliance" means different things to different people, and the meaning of "job customization" may also be unclear. The distinction between "good" and "optimal" jobs, too, will sound like semantics to some NPAs.

Supported employment is critical to achieving the transition between a "good" job and an "optimal" job. There is no one-size-fits all approach.

APSE's track record in assistance and training has resulted in an increased number of AbilityOne NPAs joining APSE's ranks. For example, APSE worked with DOL's NEON initiative and Melwood to reverse-engineer what successful transition looks like in an AbilityOne context.

She emphasized that "job customization" and "customized employment" are not the same. "Customized employment" falls within the umbrella of "supported employment," which remains the gold standard.

Ms. Feldblum noted that, given the specifics of the JWOD Act, NPAs can't be expected to move people to "optimal" jobs, but that it is important to emphasize the four components of a "good" job as defined in the Strategic Plan. She also emphasized the importance of Medicaid's Home and Community Based Services (HCBS) money.

Moderator Amy Jensen brought John Konst back to discuss the [Compliance FAQs](#), which had been updated shortly before the meeting, incorporating suggestions from NPAs and NCSE.

Ms. Zeich asked Mr. Konst to confirm that an online portal for compliance would not replace the work that NPAs do to determine compliance, but would rather be an additional double check. He said yes, and added that using the portal would be discretionary.

Ms. Jensen read a question from the Dale Rogers Training Center, which wanted to hear more about how the Commission intends NPAs to fund placements.

Ms. Feldblum said the Commission has the obligation to be a partner with NPAs in this effort. Sometimes it will be expensive; sometimes it won't be. The CNAs will have to support NPAs in

this area, to the extent possible. Also, the Commission has been talking to the Dept. of Labor's Office of Disability Employment Policy to see what Federal resources are relevant. Sometimes state resources are possible, too.

Ms. Zeich read two final quick questions from the chat:

– Would a Section 504 determination of disability from public school be an option for documentation?

Ms. Feldblum said Section 504 covers so many people it might not be relevant, given that the AbilityOne Program is set up to support people with the most significant disabilities.

– What will the impact of the 14(c) rule be on people with the most significant disabilities?

Ms. Feldblum and Mr. Cazares said the impact will be positive, and Ms. Feldblum added that the Commission is very conscious that people affected by the rule should not lose their benefits.

XII. Closing Remarks

Mr. Koses concluded the meeting, thanking attendees, speakers, and people who submitted chat questions. He encouraged attendees to think about what topics they'd like discussed in the public engagement section of future meetings, and to let the Commission know.

List of Attendees – July 21, 2022

Commission Members

Jeffrey Koses	U.S. General Services Administration (Chairperson)
Chai Feldblum	Private Citizen (Vice Chairperson)
Bryan Bashin	Private Citizen
Christina Brandt	Private Citizen
Gabe Cazares	Private Citizen
Jennifer Sheehy	U.S. Department of Labor/ODEP
Virna Winters	U.S. Department of Commerce

Commission Staff

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Ramon Barreto
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Shelly Hammond
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Steven Jones-Ellard
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Vanedra Smith
Amy Tao
Stephanie Watson
Julia Wiggins
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Kelvin Wood
Celia Wren
Janet Yandik
Ed Yang
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CART Captioning (Karasch)

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National Industries for the Blind (NIB)

David Barrett
Charles Basa
Steve Brice
Senetra Burgess
Timothy Dudley
Jason Endicott
Shelley Foust
Vivian Fridas
Amy Gray
Robert Harris
Angela Hartley
Ashley Kraus
Kelly McGarey
Thomas Mikrut
Charles Mitchell
Andy Mueck
Ellen Najjar
Nancy Ramos-Campanelli
Joyce Rey
Dean Simmonds
Edgar Villarreal
Anne-Marie Wallace
Richard Webster
Matthew Wieseler

Kevin A. Lynch President and CEO

SourceAmerica

Leejay Acham
Rosario M. Aguilar
Mike Bender
Jane Bero
Ryan Blackman
Steph Blake
Margie Boyd
Lindsey Boyington
Michelle Brownlee
Mike Caldron

John Carmichael
Catherine Chase
Theresa Chavez
Howard Cooke
Al Dawson
Brian DeAtley
Diana Dougherty
Nidia Escobar
Linda Feeney
Victoria Fields
Paula Fisher
Joe Foley
Vickie Fuller
Maggie Garcia
Marshelle Gaspar
Micky Gazaway
Gail Gordon
Carla Goulart
Heidi Graff
Angelo Grima
Jenny Hamilton
Tom Hartigan
Thomas Hawkins
Corey Heritage
Cheryl Hogarth
Ransom Holliday
Jill Johnson
Shane Kanady
Amanda King
Michael Luger
Jeffrey McCaw
Victoria Middleton
Katie Missimer
Leslie Nelson
Greer Newman
Alicia Pagan
Stephen Plastino
Josh Prosser
Chris Reger
Mickey Reyes
Derek Rogers
Caroline Satchell
Kim Scott
Karen Searles
Karen Stecher
Jessica Tagai

Ricardo Terrazas
Jay Thomas
Laurie Tolson
Wes Tyler
Heather Virasteh
Shari Walton

Richard Belden President and CEO

Federal Government Representatives

Daniel Davis	Administration for Community Living
LaRhonda Erby-Spriggs	U.S. General Services Administration
Millisa Gary	U.S. General Services Administration
Lee Mutschler	SAF/AQC
William Sproule	U.S. Department of the Air Force
Erik Urban	SAF/AQC
Rose Warner	U.S. Department of Labor
Robert Warnick	Defense Logistics Agency
Yvette Waugh	U.S. General Services Administration
Amanda Werb	U.S. General Services Administration
Jennifer Young	U.S. Department of Education

Other Attendees

Philip Ahn	Cincinnati Association for the Blind and Visually Impaired
Loretta Alford	
Delancy Allred	Autism Society of America
Debbie Baber	Bosma Enterprises
Borgi Beeler	MVW Services, Inc
Donovan Beitel	Alabama Institute for Deaf and Blind/ Alabama Industries for the Blind
Joyel Bennett	Goodwill of the Finger Lakes
Jaelyn Borchardt	Vision Forward
Lewis Bossing	Bazelon Center for Mental Health Law
Mariah Boyle	Aurora of Central New York, Inc.
Lauren Branch	NewView Oklahoma
Dan Briles	Bosma Enterprises
Fred Brown	Coleman Data Solutions
Allison Burdett	Wayfinder Family Services
Marie Campanoli	Skookum
Jennifer Campbell	VersAbility Resources, Inc.
Anthony Cancelosi	Columbia Lighthouse for the Blind
Carol Carr	ACHIEVE Human Services, Inc.

Rachel Carver	Outlook Business Solutions
Debra Chaiken	Aurora of Central New York, Inc.
Leca Chapman Diehl	TVS
Julie Christensen	Association of People Supporting Employment First (APSE)
Allen Connely	Mozaic
Cathy Cooke	Private citizen
Jewelyn Cosgrove	Melwood
Remona Cowser	The Lighthouse for the Blind, Inc
Diana Crombie	The Lighthouse for the Blind, Inc.
Jason Cross	Melwood
Tony Cucolo	PCSI
Jonathan Cunningham	NuVisions Center
Darone Dancy	Eastern Carolina Vocational Center
Dennis Dapolito	ServiceSource
Jim Debus	Diverse Enterprises for the Blind
Leo Devora	CW Resources
Joseph Diaz	Didlake Inc.
Mary Dudley	Virginia Industries for the Blind
Jessica Edmiston	Alabama Institute for Deaf and Blind - E. H. Gentry
John Ellzey	AVRE
Andrew Esterer	Challenge Unlimited, Inc.
Marisa Ethofer	Outlook Nebraska
Kenny Fernald	Association for Vision Rehabilitation and Employment, Inc.
Leon France	Goodwill of the Finger Lakes
Michael Geisler	The Lighthouse of Houston
Ann Gillmore	Peckham, Inc.
Joshua Gould	Industries of the Blind
Charlotte Hammond	Challenge Unlimited, Inc.
Catherina Hogg	Virginia Department for the Blind and Vision Impaired
Emily Homer	Melwood Horticultural Training Center, Inc.
Nate Hoover	ServiceSource
David Horton	IFB Solutions
Michael Hubbard	Horizon Industries
John Huff	ServiceSource
Cyrus Huncharek	National Disability Rights Network
Scott Iverson	ORC Industries, Inc.
Terri Johnson	The Resource Center
Lori Kain	Global Connections to Employment
Jon Katz	Bestwork Industries for the Blind
Larysa Kautz	Melwood
John Kelly	John Kelly Consulting
Bernadetta King	Opportunities for Ohioans with Disabilities
Judy Koetter	Beacon Lighthouse Inc.

Ron Lassman	Challenge Unlimited
Blake Lohnes	Outlook Nebraska
Reinhard Mabry	Alphapointe
Scott MacGregor	Central Association for the Blind
Sarah Malaier	American Foundation for the Blind
Margherita Manz	NYISE
Dean Marino	InspiriTec
Traci Martin	Alabama Industries for the Blind
Diana McCown	iYellow Group
Heather McKenzie Haddock	Louisiana Association for the Blind
Debbi McMahan	Challenge Unlimited, Inc.
Jim Meehan	Austin Lighthouse
Allison Meloy	Opportunities for Ohioans with Disabilities
Brent Mikulski	Services to Enhance Potential
Dr. Mona Minkara	Northeastern University
Philip Murph	Lions Services Inc.
Don Nelson	PRIDE Industries
Maureen Niland	Witco
Avery Oden	NewView Oklahoma
Lise Pace	Bosma Enterprises
Brian Patchett	North Central Sight Services, Inc.
Bruce Patterson	ServiceSource
Rachel Payne	Didlake
Erika Petach	Blind & Vision Rehabilitation Services
Brian Petraits	Bosma Enterprises
James Porter	Challenge Unlimited, Inc.
Jon Porter	Porter Group
David Ptaszek	Witco, Inc.
Clark Rachfal	American Council of the Blind
Valerie Reyher	The Kennedy Center, Inc.
Katrina Reynolds	CABVI
Brian Reynolds	Goodwill of the Finger Lakes
Charles Richman	SCORE
Marissa Robbins	AVRE
Brendan Ryan	Palmetto Goodwill Services
Brad Saathoff	BH Services Inc
Cheryl Sanders	SEKRI
Jennifer Simek	PRIDE Industries
Jo Sinha	Peckham, Inc
Robyn Slocum	WISE (Washington Initiative for Supported Employment)
Kevin Sonntag	Dale Rogers Training Center
Dennis Steiner	VisionCorps
David Steinmetz	Arizona Industries for the Blind

Ashlie Strackbein	ServiceSource
Chris Stream	Ada S. McKinley Community Services
Greg Szabo	The Lighthouse for the Blind, Inc.
steve tepper	ACBVI
Pat Thomas	VA Industries for the Blind
Tracy Thompson	Goodwill Services, Inc.
Livia Thompson	JBI International
Beth Tice	VisionCorps
George Tobler	VisionCorps
Duane Turnbull	Cottonwood Incorporated
Brit Vanneman	Bazelon Center for Mental Health Law
Tiffany Walker	San Antonio Lighthouse for the Blind and Vision Impaired
Laura Walling	Goodwill Industries International, Inc.
Kyle Walls	National Federation of the Blind
Masumi Ward	NewView Oklahoma
Cynthia Watson	San Antonio Lighthouse for the Blind
David WELLS	West Texas Lighthouse for the blind
Dana Werner	Bosma Enterprises
James White	Maryhaven Center of Hope
Susan Wild	Challenge Unlimited, Inc.
Jan Williams	ServiceSource
Steve Wooderson	CSAVR
Justin Young	National Federation of the Blind
Kristina Zwick	Peckham, Inc.