U.S. ABILITYONE COMMISSION

November 12, 2026

Jeffrey Koses
Senior Procurement Executive
U.S. General Services Administration
1800 F Street NW
Washington, DC 20405

Subject: Continued Coordination on Implementation of GSA Class Deviation CD-2026-03

Dear Mr. Koses:

I write to continue the productive dialogue between the U.S. AbilityOne Commission (Commission) and General Services Administration (GSA) regarding implementation of GSA Class Deviation CD-2026-03 and the shared domestic sourcing objectives outlined in recent correspondence between GSA Administrator Forst and Commission Chairperson Brandt. The Commission greatly values GSA's partnership and our shared commitment to transparency, supply chain integrity, regulatory compliance, and effective support for Federal customers.

As Chairperson Brandt noted in her September 4, 2026, response to Administrator Forst, the Commission staff will continue to work closely with you to ensure that the appropriate new business practices are implemented effectively and consistently across the AbilityOne Program. Since that response, the Commission, the Central Nonprofit Agencies (CNAs), and participating nonprofit agencies have undertaken substantial efforts to support successful implementation of the class deviation and address concerns identified by GSA.

On October 9, 2026, the Commission issued Directive 27-01, *Transparency, Accuracy, and Accountability in Country-of-Origin Documentation*. The Directive established additional requirements concerning country-of-origin verification, documentation, and reporting, and provided specific guidance to assist nonprofit agencies and CNAs in preparing for implementation of the class deviation and the elimination of the longstanding AbilityOne exception to Trade Agreements Act requirements in covered GSA channels.

The Directive required both CNAs to conduct extensive reviews of products under their stewardship, update information contained in the Verified Products Portal (VPP), identify products potentially affected by the class deviation, and incorporate country-of-origin assessment and verification into their ongoing compliance programs. The Directive further directed the AbilityOne-participating nonprofit contractors to review sourcing practices and take steps necessary to ensure compliance with applicable requirements.

In response, both CNAs submitted substantial compliance packages to the Commission. National Industries for the Blind (NIB) provided updated country-of-origin information, revised VPP data, analyses of affected products, and information concerning products requiring further review or disposition. NIB also confirmed its plan to incorporate country-of-origin verification as a routine component of its compliance oversight activities and to continue updating product information as sourcing conditions evolve.

SourceAmerica similarly completed a comprehensive review of its GSA-managed items and submitted a formal plan describing completed actions, ongoing monitoring activities, and future implementation milestones. SourceAmerica's submission included reassessments of affected products, sourcing analyses, and measures designed to make country-of-origin compliance an ongoing component of CNA oversight and support activities.

Collectively, the CNA reviews encompassed more than 10,000 unique products (National Stock Numbers), including more than 3,500 GSA-managed products. These efforts significantly improved the quality and completeness of country-of-origin information available to the Commission, GSA, Federal customers, and AbilityOne distributors. The reviews also established a foundation for continued compliance monitoring and corrective action where necessary.

By separate correspondence, the Commission is forwarding to our GSA Global Supply colleagues a courtesy copy of the VPP data which is reflected in the portal.

As implementation efforts continue, we look forward to launching the Commission-GSA working group recommended in Chairperson Brandt's September 4, 2026, letter. We anticipate that this group will provide an effective mechanism for our agencies to coordinate implementation activities, share information, and develop common procedures for:

- Nonavailability waiver requests and supporting documentation;
- Evaluation and disposition of waiver requests;
- Processing of purchase exceptions under Commission regulations;
- Treatment of existing inventories and transition periods;
- Product-status changes within GSA sales channels;
- Communications with affected nonprofit contractors and Federal customers; and
- Resolution of implementation questions that may arise as the class deviation is fully executed.

We believe these discussions will promote consistency, transparency, and predictability for all stakeholders and support our shared objective to implement these changes effectively.

In addition, we would appreciate GSA's assistance in clarifying recent product removals from certain GSA sales channels. Both CNAs have informed the Commission that a number of AbilityOne products appear to have been removed or suppressed prior to the November 12, 2026, implementation date referenced in Directive 27-01 and before affected parties had an opportunity to complete sourcing transitions, pursue waiver requests, or otherwise work through the implementation processes contemplated by the Commission.

The Commission is particularly interested in understanding the basis for these removals because, under our current understanding, AbilityOne products generally remain mandatory source requirements unless and until an authorized exception, waiver, deletion, or other appropriate disposition has been approved through the applicable process. Premature removal of products may create uncertainty for Federal customers, nonprofit contractors, and contracting personnel while potentially disrupting ongoing orders and supply arrangements.

Accordingly, we would welcome GSA's assistance in providing additional clarity regarding:

- The products that have been removed, suppressed, or otherwise made unavailable through GSA sales channels since issuance of the class deviation;
- The basis for those actions;
- Whether advance notice was provided to affected stakeholders;
- Whether nonavailability determinations, waiver reviews, purchase exceptions, or other authorizations were considered or issued in connection with the removals; and
- The process by which products were removed during this transition period may be reviewed for reinstatement, if appropriate.

We also respectfully request that GSA review any products removed prior to the November 12, 2026, implementation date or prior to completion of the applicable review process. If removals occurred before affected parties had an opportunity to pursue available compliance pathways, the Commission would welcome discussion regarding appropriate interim measures to minimize unnecessary disruptions to customers and nonprofit contractors while these matters are resolved.

Our intent is not to revisit the policy objectives reflected in the GSA Class Deviation, which the Commission is actively supporting through Directive 27-01 and related compliance initiatives. Rather, our goal is to ensure that implementation proceeds in a manner that is coordinated, predictable, and consistent with both agencies' respective authorities and responsibilities.

As always, thank you for your continuing support in creating private sector employment opportunities through the AbilityOne Program for individuals who are blind or have significant disabilities.

Sincerely,

KIMBERLY ZEICH Digitally signed by KIMBERLY ZEICH
Date: 2026.11.12 17:41:36 -05'00'

Kimberly M. Zeich
Executive Director

cc: Christina Brandt, Chairperson, U.S. AbilityOne Commission
Edward Forst, Administrator, General Services Administration
Soraya Correa, President and CEO, National Industries for the Blind
Richard Belden, President and CEO, SourceAmerica