



## OFFICE OF THE CHAIRPERSON

### DIRECTIVE

NUMBER: 26-02  
May 1, 2026

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**SUBJECT: Updated Guidance for Domestic Sourcing and Accuracy in Product Labels**

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- 1. PURPOSE.** This guidance builds upon U.S. AbilityOne Commission Directive 25-01, *Strengthening and Ensuring Consistency of AbilityOne Program Compliance with Domestic Sourcing Laws* (September 10, 2025). It reiterates the U.S. AbilityOne Commission's (Commission) commitment to President Donald J. Trump's America First Trade Policy and further commits to the implementation of Executive Order 14392, *Ensuring Truthful Advertising of Products Claiming to be Made in America*.

AbilityOne Program (Program) authorized nonprofit agencies (NPAs) are directed to ensure that the products on the Procurement List (PL) they produce fully comply with all applicable domestic sourcing laws, particularly the Buy American Act of 1933 (BAA) and Make PPE in America Act. Concurrently, this directive requires the Central Nonprofit Agencies (CNAs) and NPAs to ensure the accurate representation of Country of Origin (COO) information on product packaging.

- 2. APPLICABILITY AND SCOPE.** This directive applies to the designated CNAs and to all NPAs that produce products for sale under the auspices of the AbilityOne Program.
- 3. GUIDANCE.** The Commission's alignment with the President's objectives includes ensuring that all products provided through the AbilityOne Procurement List (PL) fully comply with relevant laws including the BAA. This also includes compliance with laws specific to the customer sponsoring the PL addition, such as the Make PPE in America Act, the Berry Amendment, the Kissell Amendment, and others. Products on the PL must be accurately labeled to ensure supply chain traceability. Failure to have traceable or accurately labeled products may result in removal from the distributor network or deletion from the PL.
  - (a) No later than **June 30, 2026**, CNAs shall update their written procedures for PL additions and price changes to reflect the procedural requirements described in this Directive.
  - (b) NPAs within the AbilityOne Program are advised to maintain, no later than **June 30, 2026**, sufficient documentation demonstrating the COO for each PL product they produce or plan to produce in order to comply with the process outlined in section 3(c) below.



(c) Beginning **July 1, 2026**, the following will occur:

- i. Before a new product is added to the PL, the recommended NPA (or CNA if it is the prime contractor) must certify the product meets all applicable sourcing laws or that it meets an exception in accordance with the Federal Acquisition Regulation (FAR) or other applicable law.
- ii. Before a price change is approved, the NPA (or CNA if it is the prime contractor) must certify or recertify that the product meets all applicable sourcing laws, or that it meets an exception in accordance with the FAR or other applicable law.
- iii. Exceptions referenced at 3(c)(i) and (ii) of this Directive may be satisfied by referencing a standing FAR-based exception (e.g., resale, IT commercial products, etc.) or after receiving written acknowledgment from the responsible contracting activity that an exception has been or will be granted before the product is sold to Federal customers (e.g., nonavailability, unreasonable cost, etc.).
- iv. Sourcing a product from a Trade Agreements Act (TAA) COO also satisfies the domestic sourcing requirement described at 3(c)(i) and (ii) of this Directive. TAA compliance alleviates the need to obtain an exception described at 3(c)(iii) of this Directive.

#### 4. REFERENCES.

- (a) 41 U.S.C. §§ 8501-8506, Javits-Wagner-O'Day (JWOD) Act
- (b) 41 U.S.C. §§ 8301-8305, Buy American Act of 1933 (BAA)
- (c) Public Law 117-58, Infrastructure Investment and Jobs Act (IIJA), Subtitle C of Title IX of Division G, Sec. 70951-70953 (Make PPE in America Act)
- (d) 19 U.S.C. §§ 2501-2581, Trade Agreements Act (TAA)
- (e) Executive Order 14392, *Ensuring Truthful Advertising of Products Claiming to be Made in America*
- (f) Homeland Security Acquisition Regulation Class Deviation (Number 23-01) – Implementation of the Make PPE in America Act
- (g) 41 C.F.R. Chapter 51, Committee for Purchase From People Who Are Blind or Severely Disabled
- (h) Presidential Memorandum *America First Trade Policy*, January 20, 2025
- (i) FAR Part 25



5. **SUPERSESSION.** None

6. **EFFECTIVE DATE AND IMPLEMENTATION.** This directive is effective immediately. Please send any questions to [policy@abilityone.gov](mailto:policy@abilityone.gov).



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