



OFFICE OF THE CHAIRPERSON

DIRECTIVE

NUMBER: 27-01

October 8, 2026

SUBJECT: Transparency, Accuracy, and Accountability in Country-of-Origin Documentation

- PURPOSE.** This Directive modifies Commission Directive 25-01, *Strengthening and Ensuring Consistency of AbilityOne Program Compliance with Domestic Sourcing Laws*, September 10, 2025, and supplements Commission Directive 26-02, *Updated Guidance for Domestic Sourcing and Accuracy in Product Labels*, May 1, 2026. Both documents reiterate the U.S. AbilityOne Commission's (Commission) commitment to President Donald J. Trump's [America First Trade Policy](#) and further commit 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 sourcing laws, particularly the Buy American Act of 1933 (BAA), the Trade Agreements Act (TAA), and the Make PPE in America Act. Concurrently, this directive requires all NPAs, authorized distributors, and central nonprofit agencies (CNAs) to ensure that Country-of-Origin (COO) information in the Federal Acquisition Service Verified Product Portal (VPP) accurately reflects the correct COO.

- APPLICABILITY AND SCOPE.** This directive applies to the designated CNAs, authorized distributors, and all NPAs that manufacture or provide products for sale through the AbilityOne Program.
- GUIDANCE.** GSA's August 14, 2026, class deviation (CD-2026-03) removes the TAA exception for AbilityOne and Federal Prison Industries (FPI) items on GSA contracts, making TAA compliance mandatory for all AbilityOne products offered through certain GSA contracting vehicles. Practically, this means contracting officers may amend solicitations or modify existing awards to enforce the new standard across schedules and Blanket Purchase Agreements (BPAs) after providing 90 days' notice to authorized NPAs in accordance with 41 CFR 51-6.12. In alignment with Directive 26-02, NPAs are expected to verify COO, maintain documentation, and certify domestic-sourcing compliance (or valid exceptions) for TAA-compliance to avoid removal from GSA schedules or BPAs. To effectuate this change, guidance in Directives 25-01 and 26-02 is hereby modified as follows:

- (a) GSA had previously instructed CNAs to use XX or ZZ, which results in N/A country codes when entering COO data in the VPP. To date, GSA has not provided additional written instructions for populating those fields, but the GSA Administrator has asked the Commission to assist GSA with developing guidance.

Accordingly, I am instructing all designated CNAs to update the appropriate VPP fields to accurately reflect the correct COO, provided by the responsible product-producing NPA, no later than **November 6, 2026**. If a significant disagreement arises between GSA and either a CNA or NPA concerning the application of the TAA to AbilityOne products, such matters shall be treated as disputes in accordance with Commission Policy 51.211(6)(c), unless and until a written agreement between the Commission and GSA provides otherwise.

- (b) Beginning **November 12, 2026**, products listed for sale on a GSA Multiple Award Schedule (MAS) or BPA must be TAA-compliant regardless of dollar amount and adhere to the following protocols before adding a new product to the PL or finalizing a price change:

- i. Before a new product is added to the PL, the recommended NPA must certify to the Commission through its designated CNA that the product is TAA compliant or has received or requested a nonavailability waiver from the contracting activity. Certification information must be included in the new addition package at the time the responsible CNA is recommending an NPA for authorization.
- ii. For existing products, the NPA must certify or recertify to the Commission through its designated CNA that the product is TAA compliant when submitting price change documentation to the Commission. A price change notice may not be published without certification or an approved nonavailability waiver or a request for a waiver from the ordering activity.
- iii. The Commission, through its Directorate of Business Operations, shall provide GSA with a listing of all products validated by the Commission **on a quarterly basis**, beginning at the end of the first quarter of fiscal year 2027.
- iv. Should a disagreement arise between a CNA (or NPA) and GSA concerning the nonavailability of a TAA-compliant source, such matters shall be treated as disputes in accordance with Commission Policy 51.211(6)(c), unless and until a written agreement between the Commission and GSA provides otherwise.

- (c) If requested, a Purchase Exception will be issued to GSA on or immediately after **November 12, 2026**, in accordance with 41 CFR § 51-5.4, for any product included on a MAS contract or BPA for any non TAA-compliant product without an approved waiver or waiver request, upon demonstration by the contracting activity that the product is available from one or more TAA-compliant commercial sources in the required quantities and timeframe to meet contract requirements subject to the following parameters:



- i. Request for Purchase Exceptions for items totaling less than the simplified acquisition threshold (SAT) will be processed by the responsible CNA in accordance with Commission Policy 51.530. Requests for items exceeding the SAT must be approved by the Commission before a Purchase Exception is issued.
 - ii. Request for a Purchase Exception where the NPA is in the process of transitioning from a non-compliant TAA source to a compliant one should not be granted if the transition time is less than 6 months. If transition time exceeds 6 months, the exception should be strictly limited to the timeframe necessary to complete the change(s).
 - iii. TAA-related Purchase Exceptions should not be given for AbilityOne products sold through GSA's Commercial Platform Programs or any other distribution channel where individual orders are less than the thresholds listed at FAR 25.402(b).
- (d) Certification and supporting documentation must comply with operating procedures established by the CNA and approved by the Commission. To enhance the accuracy and reliability of certified data, designated CNAs are required to submit to the Commission's Executive Director a proposed plan for addressing COO assessments within the CNA's compliance program by **November 6, 2026**.
- The plan should address:
- i. Actions taken by each CNA to date regarding the review of COO documentation and NPA certifications;
 - ii. The approach each CNA will use to incorporate this verification process into routine compliance activities, such as qualification assessments or other methods;
 - iii. The anticipated timeline for full implementation of these enhanced procedures in FY27.
- (e) NPAs must submit documentation supporting any cost increases resulting from the implementation of CD-2026-03 via a GSA contract modification. Specifically, if transitioning to a TAA-compliant source leads to higher costs – whether direct (such as increased material or labor expenses) or indirect (such as administrative overhead or supply chain adjustments) – NPAs should provide detailed evidence of these costs. The Commission will review and consider all substantiated cost increases when determining fair market price.



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) 19 U.S.C. §§ 2501-2581, Trade Agreements Act (TAA)
- (d) Executive Order 14392, Ensuring Truthful Advertising of Products Claiming to be Made in America
- (e) 41 C.F.R. Chapter 51, Committee for Purchase From People Who Are Blind or Severely Disabled
- (f) Presidential Memorandum America First Trade Policy, dated January 20, 2025
- (g) FAR Part 25
- (h) CD-2026-03: FAR Class Deviation, Removing AbilityOne and Federal Prison Industries, Inc. Trade Agreements Act Exception

5. SUPERSESSION. To the extent that any prior Directives refer to TAA compliance as discretionary, such provisions are hereby rescinded insofar as they pertain to the GSA contracting vehicles described in this Directive.

6. EFFECTIVE DATE AND IMPLEMENTATION. This Directive is effective immediately. Please send any questions to policy@abilityone.gov.



APPROVED: *Christina Brandt*
Christina Brandt
Chairperson



COMMITTEE FOR PURCHASE FROM PEOPLE WHO ARE BLIND OR SEVERELY DISABLED
An Independent Federal Agency

