



July 1, 2022

Jeffrey A. Koses  
Chairperson  
United States AbilityOne Commission  
1401 S. Clark Street, Suite 715  
Arlington, VA 22202

RE: Strategic Plan for Fiscal Years 2022-2026

Dear Chairperson Koses:

The National Federation of the Blind, the transformative advocacy organization of blind Americans, commends the United States AbilityOne Commission (Commission) for the work being done to transform the AbilityOne program in an effort to increase equitable employment opportunities for Americans with disabilities as outlined in the *U.S. AbilityOne Commission's Strategic Plan for FY 2022-2026*. We would like to acknowledge that the updated Strategic Plan addresses the critical concerns that we had regarding the draft plan released in March.

First, we applaud the goal expressed in Strategic Objective II: "Strategy 1: Eliminate the use of section 14(c) certificates under the Fair Labor Standards Act to pay any employee on an AbilityOne contract." Additionally, the Commission's expressed commitment to prohibit the payment of both subminimum and sub-prevailing wages to employees working in AbilityOne jobs is significant. The inclusion of sub-prevailing wages in this category of prohibited practices is one that we consider long overdue, and is absolutely essential as we move toward a more fair and equal work environment for people with disabilities. Since our founding, the National Federation of the Blind has recognized the detrimental impact the use of Section 14(c) has on people with disabilities. We are pleased that the Commission has set a goal for the elimination of the use of the subminimum wage certificate on AbilityOne contracts, and hope that it will expand wage equity for all employees with disabilities working for AbilityOne Non-Profit Agencies.

Another one of our critical concerns was the proposed expansion of the well-defined term "competitive integrated employment" (CIE). The National Federation of the Blind was opposed to any alteration of this definition that would weaken the standards for what qualified as CIE. The Commission noted in the Strategic Plan that achieving true integrated employment within the strict confines of the parameters it is legally required to meet would be difficult, and in the updated plan has created the categories of "good jobs" and "optimal jobs." A good job in the AbilityOne Program must: (1) have competitive wages and benefits for individuals with disabilities; (2) match the individual's interest and skills; (3) provide opportunities for advancement comparable to those provided to individuals without disabilities; and (4) cover individuals under employment laws. An optimal job includes each of those four attributes but also allows AbilityOne employees to work

side-by-side with employees without disabilities doing the same or similar work. While the creation of these new categories is not a perfect solution, we understand the complexities of the situation. The AbilityOne Program has a clear purpose that is uniquely different from the nation's rehabilitation system as administered under the US Department of Education. We appreciate that the Commission continues not to duplicate services but rather create a meaningful pipeline for advancement from the AbilityOne Program into competitive integrated employment. The National Federation of the Blind looks forward to working with the Commission in the future to increase the number of people with disabilities who make that transition.

Finally, we commend the Commission for its continued engagement with stakeholder disability groups such as the National Federation of the Blind during the development of the Strategic Plan. We appreciate that you consider this a "dynamic and living document." We will continue to review the plan in the coming days, and we look forward to future discussions and collaboration as the Commission executes this Strategic Plan in its goal to improve employment opportunities for Americans with disabilities.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Riccobono", with a long, sweeping horizontal stroke extending to the right.

Mark A. Riccobono, President  
National Federation of the Blind