



Section 898 Panel on Department of Defense and AbilityOne Contracting Oversight, Accountability and Integrity

May 2, 2019



- We represent the collective voice of the SourceAmerica[®] nonprofit agency community employers and the people with disabilities they employ by:
 - Serving as a trusted advisor to SourceAmerica and the U.S. AbilityOne Commission[®] on behalf of the community of nonprofit employers
 - Facilitating a network among SourceAmerica's nonprofit employers that fosters collaborative sharing of effective and innovative practices
 - Providing thought leadership – to vet key issues, provoke meaningful discussion, issue calls to action and write position papers – in support of our network and of SourceAmerica's efforts to create fulfilling employment opportunities for people with disabilities

NCSE Strategic Focus



Purpose ~ To empower a workforce of universal inclusion, realized potential and fulfillment.

Vision ~ Employment rate of people with disabilities mirrors that of the entire workforce/general population.

Values

<p>Integrity Maintaining the highest quality standards of compliance and stewardship with appropriate oversight, accountability and governance through modeling best practices</p>	<p>Respect Honoring the dreams, wishes and desires of all individuals while embracing diversity</p>	<p>Choice Ensuring maximum exposure to resources that create outcomes conducive to the individual's wants, needs, preferences and informed decision-making</p>	<p>Equality Nurturing an environment that promotes capability, encourages upward mobility, is free from prejudice and bias, and advocates inclusion in all aspects of life by respecting all abilities</p>	<p>Fulfillment Creating opportunities that empower individuals to realize their greatest potential and lead lives rich in meaning and fulfillment of purpose</p>

Our Strategic Goals and Initiatives

Workforce Development	Job Creation	Fulfillment and Public Awareness	Public Policy/Self-Advocacy
<p>Create systems and opportunities to facilitate upward mobility, further develop employment training and empower individuals to direct their lives with meaning and purpose.</p>	<p>Create systems to increase employment opportunities, promote growth and fulfillment, and address the current and future capabilities and capacity of the network.</p>	<p>Establish a system to measure fulfillment and methods of communicating results.</p>	<p>Through self-determination, people with disabilities are empowered to direct their lives by promoting public policy that fosters choice and provides employment options.</p>
<ol style="list-style-type: none"> 1. Identify existing employment training resources within the NCSE and incorporate them into a resource library utilizing SourceAmerica's training platform. 2. Establish a Peer Mentoring Program to train employees without disabilities as natural supports within the workplace. 3. Launch a campaign to promote awareness and the adoption of adaptive and assistive technology. 	<ol style="list-style-type: none"> 1. Create a cross-functional team to collaborate with SourceAmerica business development to identify current and future capabilities of the workforce and the capacity of the NCSE network. 2. Develop a plan with SourceAmerica leadership to promote expansion and development of new jobs arising from existing/new lines of business and opportunities for job placement on all 	<ol style="list-style-type: none"> 1. Support SourceAmerica in finding and working with a data partner to develop a measurement tool for fulfillment of people with significant disabilities in the workplace. 2. Pilot a measurement tool(s) to gather data on fulfillment of work for people with significant disabilities. 3. Work with SourceAmerica and other partners to find the communication methods that 	<ol style="list-style-type: none"> 1. Encourage, support and foster grassroots participation, dialogue and network engagement to affect changes in conjunction with SourceAmerica initiatives. 2. Create Self-Advocate participation/tracks in NCSE CEO/Senior Leadership Forums and other forums. 3. Develop program designed to mentor agencies in developing self-advocacy programs.

NCSE Approach to the 898 Panel Recommendations



- Launched collaborative effort in October 2018
 - Analysis and prioritization of recommendations
 - Discussion at NCSE CEO/Senior Leadership Forums
 - Formulation of implementation strategies (ongoing)
- Partnered with the U.S. AbilityOne Commission to establish CEO Roundtable in February 2019
 - Initially focusing on five key initiatives:
 1. Direct Labor Ratio
 2. Definition of Disability
 3. Pricing
 4. Competition
 5. Section 14(c) of the Fair Labor Standards Act

NCSE Perspective on 898 Panel Recommendations



- Implementation of priority recommendations that focus on:
 - Accountability
 - Program Effectiveness (Affordability, Customer Service, Transparency)
 - Employment (Program Impact)
- Building on previous work and actions already underway by SourceAmerica and within the NPA community



- Fully implement 2017 and 2018 Defense Policy Memorandums regarding utilization and training for the AbilityOne Program
- Promote and expand Defense Acquisition University training through multiple channels



- Increase transparency of SourceAmerica's NPA Recommendation Process
- Improve and strengthen pricing guidance and pricing tools



- Strengthen the Individual Eligibility Evaluation Form (IEE) process through training and certification
- Consider new process to allow outside submissions of the IEE (by the VA, states, or others) but do not require NPAs to outsource the IEE
 - Recognize NPA role in defining career goals and tracking employment outcomes



- Revise the definition of “qualified nonprofit agency” by reducing 75 percent Direct Labor Ratio
 - SourceAmerica’s Ratio Demonstration Project
 - Allowing indirect labor positions to be counted in ratio calculation
- Revise the definition of “other severely disabled”
 - Amend the statement: “prevents the individual from currently engaging in normal competitive employment”
 - Relationship to IEE and defined eligibility for veterans



- Revise the definition of “other severely disabled”
- Strengthen veteran employment at NPAs
 - NCSE Veterans Committee
 - Veterans Survey Results



- Refine SourceAmerica’s process for designation and allocation of work (NPA Recommendation Process)
 - Update Commission policy and best practices to provide sufficient oversight and transparency
 - Create incentives for inclusion and mentoring of smaller nonprofits and veteran employment opportunities on DoD contracts
- Establish policy and business rules that include competition and re-competition in the AbilityOne Program
 - Competition Pilot



- Establish a DoD contracting goal and require the use of AbilityOne representatives (Policy)
- Modify the Procurement List timeline (Policy)
- Update the online Procurement List to reflect detailed information and improve search functions to enable a more user-friendly interface (Technology)

Conclusion



Section 898 Panel Cross-walk

This document shows the relationship between the many cross-cutting themes included in the First Annual Report to Congress issued by the Panel on Department of Defense and AbilityOne® Contracting Oversight, Accountability and Integrity (Panel). These themes were identified by the National Council of SourceAmerica Employers (NCSE) community and encompass the multiple recommendations made by the Panel's subcommittees. The "cross-walk" also includes short and long-term priority actions under each cross-cutting theme recommended by the NCSE community to inform the Panel's implementation strategies in their second annual report to Congress.

Cross-Cutting Themes	Inspector General Subcommittee 1	Eliminate Waste, Fraud and Abuse Subcommittee 2	Employment Initiatives Subcommittee 3	Laws and Regulations Subcommittee 4	Veterans Eligibility Subcommittee 5	Acquisition and Procurement Subcommittee 6	Business Process Re-Engineering Subcommittee 7	NCSE Recommendations Priority Actions for Implementation (Already Underway/Short-term)	NCSE Recommendations Priority Actions for Implementation (Long-term)
Direct Labor Ratio		✓	✓	✓	✓			SourceAmerica® and the U.S. AbilityOne Commission* conduct direct labor ratio demonstration project.	Congress amends Javits-Wagner-O'Day Act definition of "qualified nonprofit agency" to reduce the existing direct labor ratio.
Statutory Definitions				✓	✓			(1) SourceAmerica and the Commission conduct direct labor demonstration project and (2) With continued input from CNAs and NPAs, the Commission develops pilot to test revised definition of "other severely disabled."	(1) Congress amends Javits-Wagner-O'Day Act definition of "qualified nonprofit agency" to reduce the existing direct labor ratio and (2) Congress amends Javits-Wagner-O'Day Act definition of "other severely disabled" to clarify reference to "normal competitive employment."
Individual Eligibility Evaluation (IEE)		✓	✓	✓	✓			(1) CNAs establish mandatory IEE training and certification procedures for NPAs and (2) With additional input from CNAs and NPAs, the Commission revises IEE form to allow outside submissions by the VA and other federal/state government entities.	(1) Congress amends Javits-Wagner-O'Day Act definition of "qualified nonprofit agency" to reduce the existing direct labor ratio and (2) Congress amends Javits-Wagner-O'Day Act definition of "other severely disabled" to clarify reference to "normal competitive employment."
Veteran Employment			✓	✓	✓	✓		(1) SourceAmerica and NPAs continue coordinated effort with the Commission to enhance veteran employment and (2) With additional input from CNAs and NPAs, the Commission revises IEE form to allow outside submissions by the VA and other federal/state government entities.	Congress amends Javits-Wagner-O'Day Act definition of "other severely disabled" to clarify reference to "normal competitive employment."
SourceAmerica's NPA Recommendation Process/Competition		✓				✓	✓	(1) SourceAmerica and the Commission continue refinements to increase transparency in the process and (2) SourceAmerica and the Commission conduct competition pilot.	SourceAmerica and the Commission implement new policies and procedures for the NPA Recommendation Process and competition in the Program.
Pricing for AbilityOne Contracts		✓				✓	✓	CNAs and the Commission continue work to improve and strengthen pricing guidance and tools.	CNAs and the Commission design and launch centralized pricing database for federal contracting agencies.
Training for Federal Contracting Workforce	✓						✓	DoD expands and fully implements DAU training requirements through multiple channels.	DAU training is continuously updated to reflect changes in policies and procedures implemented by DoD, the Commission and CNAs.
Training for NPAs/ SourceAmerica			✓		✓	✓		(1) CNAs establish mandatory IEE training and certification procedures for NPAs and (2) SourceAmerica deploys updated training on changes to the NPA Recommendation Process.	CNAs continuously update training for NPAs to incorporate changes in law, regulation and/or the Commission's policies and procedures.
Employment Growth	✓	✓	✓	✓	✓	✓	✓	(1) SourceAmerica and NPAs continue implementation of employment growth strategies pursuant to the Commission Cooperative Agreement and NCSE Strategic Plan and (2) DoD establishes contracting goal and requires use of AbilityOne representatives.	CNAs and NPAs work with the Commission and DoD AbilityOne representatives to achieve employment growth through implementation of a DoD contracting goal.

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