



U.S. General Services Administration

August 14, 2026

Christina Brandt
Chairperson
U.S. AbilityOne Commission

Dear Chairperson Brandt:

When the Federal Government buys products on behalf of the American people, taxpayers deserve transparency into how their dollars are spent. Stronger procurement transparency helps prevent waste, builds trust, and ensures every Federal dollar is working for the people it is meant to serve. President Trump's "Ensuring Truthful Advertising of Products Claiming to be Made in America" Executive Order directs the U.S. General Services Administration (GSA) to verify the accuracy of all products represented as "Made in America" across all GSA-managed buying platforms, including those listed as Buy American Act (BAA) compliant or "Country of Origin USA."¹ This effort strengthens oversight of Federal purchasing channels and helps ensure agencies, vendors, and taxpayers can trust that "Made in America" claims are accurate, consistent, and verifiable.

The AbilityOne Commission's (Commission) Procurement List (PL) is a mandatory source of supply and services for the entire Federal Government, and Nonprofit Agencies (NPAs) regularly sell thousands of products on GSA's buying platforms. In light of this, GSA directs that the Commission complete a comprehensive review of all products offered for sale through GSA. GSA also requests that the Commission expand its participation in this review to identify all Countries of Origin (COO) of its products in the Federal Acquisition Service Verified Product Portal.

The Commission maintains the PL from which Federal agencies are required to procure products. Under the Javits–Wagner–O'Day Act, PL products are required to be manufactured or assembled by qualified NPAs designated by the Commission.² On September 10, 2025, through Commission Directive 25-01, the Commission required the Central Nonprofit Agencies to inventory PL products for COO determinations and to flag supply chain risks within 120 days.³ On May 1, 2026, through Commission Directive 26-02, the Commission advised AbilityOne NPAs to maintain supply chain documentation and set forth the expectation that certifications will accompany PL additions and price changes going forward.⁴ We appreciate the Commission's work to support the Administration's Made in America efforts and the prior

¹ Executive Order 14392, 91 FR 13201, Mar. 18, 2026, <https://www.govinfo.gov/content/pkg/FR-2026-03-18/pdf/2026-05383.pdf>.

² Javits–Wagner–O'Day Act, 41 U.S.C. §§ 8501–8506, <https://uscode.house.gov/>.

³ U.S. AbilityOne Commission, Directive Number 25-01, Strengthening and Ensuring Consistency of AbilityOne Program Compliance with Domestic Sourcing Laws, Sept. 10, 2025, https://www.abilityone.gov/laws_regulations_and_policy/documents/U.S.%20AbilityOne%20Commission%20Directive%20-%20Compliance%20with%20Domestic%20Sourcing%20Laws%2020250910a%20signed.pdf, (Accessed Aug. 11, 2026).

⁴ U.S. AbilityOne Commission, Directive Number: 26-02, Updated Guidance for Domestic Sourcing and Accuracy in Product Labels, May 1, 2026, https://www.abilityone.gov/laws_regulations_and_policy/documents/U.S.%20AbilityOne%20Commission%20Directive%2026-02%20Updated%20Guidance%20for%20Domestic%20Sourcing%20and%20Accuracy%20in%20Product%20Labels%2020260501-1252a.pdf, (Accessed Aug. 13, 2026).

directive efforts, as well as actions initiated on July 1, 2026, in conjunction with GSA, to ensure that all new PL products are BAA compliant and that compliance is substantiated by a BAA Certificate or an approved waiver.

While these are important first steps, GSA adheres to the highest standards for BAA compliance and has detected potential areas of concern with the AbilityOne Program that necessitate the request for a comprehensive review. For example, on the PL, GSA has found multiple examples of AbilityOne-associated technology products labeled on GSA procurement platforms as “Country of Origin: USA” that are, in fact, from China and other foreign countries (see Appendix A). Federal agencies, including the U.S. Department of War (DoW), are required (41 U.S.C. § 8504) to procure these critical technology products from AbilityOne, raising both potential cyber risks and national security concerns.⁵

Additionally, it appears that the Commission’s application of the “Essentially the Same” (ETS) policy may allow AbilityOne to replace American-made products from GSA’s platforms with their own products that appear to be foreign-sourced from countries like China (see Appendix B).⁶ This raises significant concerns about harm to domestic manufacturers as well as our national security, as this may facilitate supply chain dependency on foreign countries.

GSA has also identified several other concerning issues with the program, including inflated price markups, likely contributing to curiously high executive compensation for non-disabled nonprofit leadership, and prior False Claims Act lawsuits. For example, products sold to the Government by AbilityOne-affiliated nonprofits carry markups of up to 55 percent,⁷ delivering limited or no meaningful employment or value added to the taxpayer while likely helping fuel outsized executive compensation at affiliated nonprofits. Affiliated nonprofit CEOs enjoy salaries as high as \$1.1 million funded by tax dollars through Federal procurement while blind workers make salaries, on average, of approximately \$33,000 per year (see Appendix C).⁸ To remind you within the contiguous United States, the poverty line for a family of four is also \$33,000 per year.⁹

Regarding False Claims Act lawsuits, in 2020, a Wisconsin-based AbilityOne nonprofit, Industries for the Blind and Visually Impaired, Inc. (IBVI), was accused of three things: misrepresenting to the Commission that it would maintain a 3:1 blind-to-sighted employee ratio on Federal furniture contracts, accepting payments and gifts from manufacturers, and improperly subcontracting screen-printing work to an entity that did not use blind labor.¹⁰ This resulted in IBVI paying the U.S. Government nearly

⁵ Notably, under the Berry Amendment (10 U.S.C. § 4862), DoW is required to purchase only U.S.-made clothing, tents, flatware, etc., but must purchase critical technology from potentially risky foreign-made producers under the PL.

⁶ U.S. AbilityOne Commission, Policy 51.541: Requirement to Purchase Products on the Procurement List Instead of “Essentially the Same (ETS)” Items, https://www.abilityone.gov/laws_regulations_and_policy/documents/US%20AbilityOne%20Commission%20Policy%2051%20541%20Requirement%20to%20Purchase%20PL%20Products%20Instead%20of%20Essentially%20the%20Same%20Final.pdf, (Accessed Aug. 11, 2026).

⁷ U.S. AbilityOne Commission, Policy 51.540: AbilityOne Authorized Commercial Distributor Program Requirements, https://www.abilityone.gov/laws%2C_regulations_and_policy/documents/U.S.%20AbilityOne%20Commission%20Policy%2051.540%20AbilityOne%20Authorized%20Commercial%20Distributor%20Program%20Requirements%2020260622%20signed-a.pdf, (Accessed Aug. 10, 2026).

⁸ National Industries for the Blind, Impact: 2025 Annual Report, <https://annualreport.nib.org/2025/impact>, (Accessed Aug. 13, 2026).

⁹ Department of Health and Human Services, Annual Update of the HHS Poverty Guidelines, 91 FR 1797, Jan. 15, 2026, <https://www.federalregister.gov/documents/2026/01/15/2026-00755/annual-update-of-the-hhs-poverty-guidelines>.

¹⁰ U.S. General Services Administration Office of Inspector General, Wisconsin-Based Nonprofit to Pay \$1.9 Million to Settle Allegations of False Claims and Kickbacks on Federal Contracts,

\$2 million to resolve allegations of violating the False Claims Act and the Anti-Kickback Act.¹¹ More recently, in October 2021, Connecticut-based AbilityOne nonprofit, CW Resources, Inc., paid \$600,000 to resolve False Claims Act allegations that it submitted false annual certifications claiming compliance with the Program's 75 percent direct labor hour requirement for significantly disabled employees, when the actual hours worked by qualified individuals were substantially lower and were not supported by adequate medical documentation.¹²

In light of this, GSA requests that the Commission promptly conduct a full audit of all items offered for sale through GSA and related procurement data to verify COO representations, pricing, sourcing, and compliance with applicable law and policy. Such an audit is necessary to provide transparency and accountability to the American people, protect the integrity of Federal procurement, and ensure that taxpayer dollars are not supporting inaccurate or misleading claims.

The Commission shall submit the following information by November 12, 2026:

- All items offered for sale to ensure that all are listed accurately and with the correct COO in the Federal Acquisition Service Verified Product Portal.
- Any products with accurate COOs that are currently certified as "N/A" or "ZZ."
- Documentation on how the Commission will complete continuous reviews.

GSA holds all its contractors to the highest standards. To ensure we apply the same rules to the AbilityOne Program, I'm instructing my Senior Procurement Executive to promptly take appropriate action to eliminate the exception that permits the Commission to offer items originating in China and other non-allied nations. He will work with GSA and the Commission to ensure effective implementation.

GSA appreciates the Commission's prompt attention to this matter. Ensuring that PL products available through GSA channels are fully compliant is essential to maintaining the integrity of the AbilityOne Program, the Federal marketplace, and the Government's procurement obligations.

Sincerely,

Edward C. Forst
Administrator

cc: Kimberly Zeich, Executive Director, AbilityOne Commission
Soraya Correa, President and Chief Executive Officer, National Industries for the Blind
Richard Belden, President and Chief Executive Officer, SourceAmerica
Laura Stanton, Acting Commissioner, Federal Acquisition Service, General Services Administration

<https://www.gsaig.gov/news/wisconsin-based-nonprofit-pay-19-million-settle-allegations-false-claims-and-kickbacks-federal>, (Accessed Aug. 12, 2026).

¹¹ Id.

¹² U.S. Attorney's Office, District of Connecticut, Connecticut Employment Contractor Pays \$600K to Resolve Federal False Claims Act Allegations, Oct. 13, 2021, <https://www.justice.gov/usao-ct/pr/connecticut-employment-contractor-pays-600k-resolve-federal-false-claims-act-allegations>, (Accessed Aug. 12, 2026).

Appendices

Appendix A: Chinese and other Foreign Goods Branded as “Made in USA” for Government Sales

GSA has found multiple AbilityOne products listed on GSA Advantage![®], which relies on vendor self-certification, with a stated “Country of Origin: USA” designation, while the products themselves are labeled “Made in China” or other foreign countries. For example:

- **NSN 7050-01-689-7545 — External Hard Drive.** This product is listed on GSA Advantage![®] under the referenced country-of-origin representation of the United States, while product labeling reviewed by GSA indicates “Made in China.”¹³
- **NSN 7045-01-558-4992 — USB Flash Drive.** This product is listed on GSA Advantage![®] under the referenced country-of-origin representation of the United States, while product labeling reviewed by GSA indicates “Made in China.”¹⁴
- **NSN 7025-01-677-4742 — PC Keyboard.** This product is listed on GSA Advantage![®] under the referenced country-of-origin representation of the United States, while product labeling reviewed by GSA indicates “Made in China.”¹⁵
- **7025-00-NIB-0015 — Docking Station.** This product is listed on GSA Advantage![®] with a country-of-origin representation of the United States, while product labeling reviewed by GSA indicates that the dock is “Made in Thailand,” the mounting bracket is “Made in Taiwan,” and the power adapter that connects the docking station to external monitors, keyboards, mice, and power supplies is “Made in China.”¹⁶
- **NSN 6728906 — Portable Power Pack.** This portable power pack is listed on GSA Advantage![®] with a country-of-origin representation of the United States, while product labeling reviewed by GSA indicates “Components Made in China.”¹⁷
- **NSN 7025-01-618-4138 — Optical Mouse.** This optical mouse is listed on GSA Advantage![®] with country-of-origin representation as United States, while product labeling reviewed by GSA indicates “Made in China.”¹⁸

¹³ GSA Advantage![®], Product Detail for 11000121214952, https://www.gsaadvantage.gov/advantage/ws/catalog/product_detail?gsin=11000121214952, (Accessed Aug. 12, 2026).

¹⁴ GSA Advantage![®], Product Detail for 11000005023458, https://www.gsaadvantage.gov/advantage/ws/catalog/product_detail?gsin=11000005023458, (Accessed Aug. 12, 2026).

¹⁵ GSA Advantage![®], Product Detail for 11000125877379, https://www.gsaadvantage.gov/advantage/ws/catalog/product_detail?gsin=11000125877379, (Accessed Aug. 10, 2026).

¹⁶ GSA Advantage![®], Product Detail for 11000112925795, https://www.gsaadvantage.gov/advantage/ws/catalog/product_detail?gsin=11000112925795, (Accessed Aug. 13, 2026).

¹⁷ GSA Advantage![®], Product Detail for 11000070998455, https://www.gsaadvantage.gov/advantage/ws/catalog/product_detail?gsin=11000070998455, (Accessed Aug. 12, 2026).

¹⁸ GSA Advantage![®], Product Detail for 11000031602309, https://www.gsaadvantage.gov/advantage/ws/catalog/product_detail?gsin=11000031602309, (Accessed Aug. 11, 2026).

Appendix B: Displaced U.S.-Made Products via ETS

Example 1: Terravive USA-Made Products Displaced by AbilityOne Products

Terravive, which produces 100 percent U.S.-made dinnerware products, sells its products to Government agencies through GSA procurement platforms. Seven Terravive products were delisted from GSA's procurement platforms and replaced with AbilityOne products in 2023.¹⁹ U.S. Customs import data suggests that AbilityOne's replacement is Chinnet Huhtamaki compostable bowls under NSN 7350-01-332-2111, and import data indicates that those bowls are imported from China.

This creates a compliance dilemma for Government agencies. For example, DoW is required to purchase 100 percent domestic dinnerware and stainless-steel flatware pursuant to Section 842 of the National Defense Authorization Act for Fiscal Year 2025 (Pub. L. 118-159), which added these products to the covered list at 10 U.S.C. § 4862 (Berry Amendment) effective January 1, 2026 (sunset January 1, 2029).²⁰ The requirement is implemented by the Defense Pricing and Contracting class deviation (USA002677-25-DPCAP/DFARS clause 252.225-7965).²¹ Due to the removal of ETS products, DoW has access only to the products that appear to be from China. The supplier locations and shipments from the U.S. Customs Import Records, 2015–2026,²² for Chinnet Huhtamaki include:

- Shaoneng Group Guangdong Luzhouz Eco Quan'an, China
- Zhejiang Zhongxin Environmental Pro Yongchang, China
- Jinhua Zhongsheng Fiber Products Jinhua, China

¹⁹ In 2023, GSA sent a letter to Terravive notifying the company of AbilityOne's ETS policy and that their products deemed "essentially the same" as AbilityOne's would be removed from GSA's procurement platforms. Copy of letter can be provided by GSA.

²⁰ Section 842 of the Servicemember Quality of Life Improvement and National Defense Authorization Act for Fiscal Year 2025, Pub. L. 118-159, Dec. 23, 2024, amending 10 U.S.C. § 4862(b) to add stainless steel flatware and dinnerware (effective Jan. 1, 2026; sunset Jan. 1, 2029).

²¹ Implemented by Department of Defense Class Deviation 2026-O0033 (USA002677-25-DPCAP, Jan. 2026), which prescribes DFARS clause 252.225-7965, Acquisition of Dinnerware and Stainless-Steel Flatware (DEVIATION 2026-O0033) (Jan. 8, 2026).

²² According to www.importyeti.com, (Accessed Aug. 10, 2026).

Example 2: The table below provides a sampling of verified instances in which GSA identified American-manufactured products that were displaced by products of Chinese origin as a result of AbilityOne mandatory purchasing requirements. These examples are not exhaustive.

Product	U.S. Manufacturer Location	AbilityOne Item Source	AbilityOne Mandatory Procurement List National Stock Number
Dinnerware ²³	Virginia	China	NSN 7350-01-664-6909
Wet Floor Sign ²⁴ and Mop Bucket ²⁵	Virginia	Claimed USA, Supporting Documents show China	NSN 9905-01-588-2362 NSN 7920-01-343-3776
Snow shovel ²⁶	Indiana	China / Multiple Sources	NSN 5120-01-611-8069

²³ GSA Advantage!®, Product Detail for 11000060292503, https://www.gsaadvantage.gov/advantage/ws/catalog/product_detail?gsin=11000060292503, (Accessed Aug. 12, 2026).

²⁴ GSA Advantage!®, Product Detail for 11000007934902, https://www.gsaadvantage.gov/advantage/ws/catalog/product_detail?gsin=11000007934902, (Accessed Aug. 13, 2026).

²⁵ GSA Advantage!®, Product Detail for 11000006302910, https://www.gsaadvantage.gov/advantage/ws/catalog/product_detail?gsin=11000006302910, (Accessed Aug. 10, 2026).

²⁶ GSA Advantage!®, Product Detail for 11000035588859, https://www.gsaadvantage.gov/advantage/ws/catalog/product_detail?gsin=11000035588859, (Accessed Aug. 12, 2026).

Appendix C: AbilityOne Salary Concerns

In 2020, the National Council on Disability (NCD) issued a report highlighting how AbilityOne nonprofit CEOs were receiving salaries far beyond the highest-paid Federal employees.²⁷ In addition, NCD criticized the program by stating that increased purchases through the AbilityOne Program have increased revenue “without resulting in increased employment of the target population.”²⁸ In a 2024 NCD report, the agency recommended an 8-year phaseout of the AbilityOne Program, requiring instead that blind and disabled workers be hired by Federal contractors directly.

The following table highlights the disparity for a sample group of locations, based on required reporting:

Blind & Disabled Avg. Yearly Salary	AbilityOne Nonprofit Agency	FY24–FY25 AbilityOne Nonprofit CEO Compensation Range
\$33,000²⁹	LC Ind Inc. ³⁰	\$500,000–\$1,000,000+
	Industries for the Blind and Visually Impaired ³¹	
	Chicago Lighthouse Industries ³²	
	National Industries for the Blind ³³	
	Winston Salem Industries for the Blind Inc. ³⁴	
	San Antonio Lighthouse for the Blind ³⁵	

²⁷ National Council on Disability, Policies from the Past in a Modern Era: The Unintended Consequences of the AbilityOne Program & Section 14(c), Oct. 14, 2020.

²⁸ Id.

²⁹ National Industries for the Blind, Impact: 2025 Annual Report, <https://annualreport.nib.org/2025/impact>, (Accessed Aug. 12, 2026).

³⁰ LC Ind Inc., Nonprofit Explorer, ProPublica, <https://projects.propublica.org/nonprofits/organizations/560686307>, (Accessed Aug. 10, 2026).

³¹ Industries for the Blind and Visually Impaired Inc., Nonprofit Explorer, ProPublica, <https://projects.propublica.org/nonprofits/organizations/390840476>, (Accessed Aug. 12, 2026).

³² Chicago Lighthouse Industries, Nonprofit Explorer, ProPublica, <https://projects.propublica.org/nonprofits/organizations/475665042>, (Accessed Aug. 11, 2026).

³³ National Industries for the Blind, Nonprofit Explorer, ProPublica, <https://projects.propublica.org/nonprofits/organizations/135596799>, (Accessed Aug. 10, 2026).

³⁴ Winston Salem Industries for the Blind, Nonprofit Explorer, ProPublica, <https://projects.propublica.org/nonprofits/organizations/566001467>, (Accessed Aug. 12, 2026).

³⁵ San Antonio Lighthouse for the Blind, Nonprofit Explorer, ProPublica, <https://projects.propublica.org/nonprofits/organizations/741339051>, (Accessed Aug. 12, 2026).