



**U.S. AbilityOne Commission
Office of Inspector General**

EVALUATION REPORT

**Evaluation of the Commission's
Access to AbilityOne Program
Data**

OE-2025-01

September 29, 2025



**U.S. AbilityOne Commission
Office of Inspector General**

355 E Street SW (OIG Suite 335)
Washington, DC 20024-3243

September 29, 2025

MEMORANDUM

TO: Robert D. Hogue
Chairperson
U.S. AbilityOne Commission

Kimberly M. Zeich
Executive Director
U.S. AbilityOne Commission

FROM: Carla Smith *Carla Smith*
Acting Inspector General
U.S. AbilityOne Commission OIG

SUBJECT: Final Report of the Evaluation of the U.S. AbilityOne Commission's Access to AbilityOne Program Data

We are pleased to provide the following final evaluation report on the U.S. AbilityOne Commission's access to AbilityOne Program data. The U.S. AbilityOne Commission Office of Inspector General (OIG), Office of Audit and Evaluation conducted this evaluation and issued this report.

We appreciate the Commission's assistance during the course of the . If you have any questions, please contact me or Laurretta A. L. Joseph, Assistant IG for Audit and Evaluation at 571-329-3419 or at ljoseph@oig.abilityone.gov.

cc: Christina Brandt
Vice Chairperson
U.S. AbilityOne Commission

Kelvin Wood
Chief of Staff
U.S. AbilityOne Commission

U.S. AbilityOne Commission Office of Inspector General, Office of Audit and Evaluation



Results in Brief

Evaluation of the Commission's Access to AbilityOne Program Data

Office of Inspector General Report No. OE-2025-01 Report Date: September 29, 2025

Why We Performed This Evaluation

The Office of Inspector General (OIG) initiated this review to identify AbilityOne Program data generated or maintained by Central Nonprofit Agencies (CNA) and/or Nonprofit Agencies (NPA), that is not currently available to the U.S. AbilityOne Commission (Commission).

What We Evaluated

The evaluation team reviewed and analyzed the new 2024 Cooperative Agreements between the Commission and CNAs, as well as Commission policies and procedures related to data collection and reporting.

What We Found

The OIG found no data had been collected in the new electronic systems at the time of our review. Based on the updated Cooperative Agreements between the Commission and CNAs, the Commission anticipates having access to relevant program data and the new CNA electronic data systems October 1, 2025. The Commission stated it anticipates collecting data using the new electronic systems for approximately one year so that they have enough data points to ensure they are receiving the appropriate data and identifying various trends and patterns within the data.

Through this evaluation, the OIG observed that if the Commission wants to meet its deadline of implementing the electronic data collection and data dashboard by October 1, 2025, it needed to improve communication with DWG. Specifically, clear communication between the Commission and DWG is needed to ensure that relevant data is displayed on the dashboards once they are created.

What We Recommend

The OIG has no specific recommendations associated with this report.

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Objectives and Background

Objective

The objective of our evaluation was to identify AbilityOne Program data generated or maintained by Central Nonprofit Agencies (CNA) and/or Nonprofit Agencies (NPA), that is not currently available to the U.S. AbilityOne Commission (Commission).

Background

U.S. Government Accountability Office Report GAO-23-105460

In July 2023, the U.S. Government Accountability Office published a report to Congressional Committees, emphasizing that data helps inform decisions, policies, and achieve agency missions. It can provide tangible outcomes and metrics for programs and can be beneficial during the strategic planning process. Data can also provide information about the progress of a program, for planning and program management efforts.

Updated Cooperative Agreements and New Data Collection Forms

As required by law¹, the AbilityOne Commission enters into a Cooperative Agreement with its two CNAs, National Industries for the Blind (NIB) and SourceAmerica. These Cooperative Agreements outline the tasks, requirements, and responsibilities between the Commission and the CNAs, as well as between the CNAs and NPAs.

The most recent Cooperative Agreements were executed in December 2024. The 2024 agreements included the use of new electronic data collection forms and the development of systems to collect it. The CNAs were specifically tasked to develop web-based data collection tools and comprehensive data dashboards. The data collection requirements include AbilityOne Program-level data, such as NPA contract performance and Program compliance data, CNA-specific reporting data, and NPA employee qualification and career development data.

The new forms and data collection systems created from the new requirements will take the data input by the NPA² and use it to generate the data dashboards. This will allow the Commission to view information as it was entered by the NPA. For instance, the Commission will be able to see data on individual participating employees, such as how they were referred to the AbilityOne program (via Social Security, Veterans Affairs (VA), schools, etc.) and information on NPAs' career development capacity, activities, and participating employees.

As a means to facilitate compliance with the new requirements, the Commission established the data working group (DWG). The DWG is led by the Commission, with CNA participation to

¹ Consolidated Appropriations Act of 2016, Pub. L. No.114-113, December 18, 2015.

² The data that is input by the NPAs will be stored and managed by the CNAs.

support the implementation of the Cooperative Agreements. The Commission created the DWG to collaborate on the methods of collecting and displaying the required data. The DWG used the Commission's new data collection forms³ as their guide to develop the collection tools and executive dashboards (dashboards) that will comply with the new data requirements outlined in the Cooperative Agreements.

The Cooperative Agreements further reiterate that the Commission should determine if the data collected by the NPAs meets the standards that the Commission established. In turn, the CNAs will collect records and report all data and documents used for compliance oversight of a NPA in an electronic format that allows the Commission to easily access the data.

³ The new data collection forms include the Disability Qualification Determination (DQD), Participating Employee Information (PEI), and AbilityOne NPA Annual Representations and Certifications (ARC).

Scope and Methodology

The OIG conducted our work from April 2025 through July 2025. The OIG conducted this evaluation in accordance with the Quality Standards for Inspection and Evaluation issued by the Council of Inspectors General on Integrity and Efficiency.

The OIG evaluation team reviewed and analyzed the new 2024 Cooperative Agreements, 41 Code of Federal Regulations (CFR) 51 AbilityOne Program Requirements, the Commission's Policies 51.400 and 51-402, and previous related GAO and OIG reports. The OIG also met with Commission management, the Chief Executive Officers of NIB and SourceAmerica, and the DWG.

Limitation

In our discussions with the Commission, CNAs, and DWG as well as our review of the Cooperative Agreements, the OIG learned that the new data collection requirements begin October 1, 2025, thus limiting the data the OIG could collect during the scheduled review. As such, no relevant data would be available until after the new electronic data systems and dashboards are created, halting the OIG evaluation. Also, the OIG found at the time of this evaluation, the CNAs were still in the process of developing certain data collection procedures and continue to work with the Commission on the development of the data dashboards. Thus, this report does not identify data generated or maintained by CNAs and/or NPAs that is not currently available to the Commission. Instead, this report highlights the Commission's ongoing efforts to increase data collection and our identification of potential barriers to success.

Results

Implementation Of Updated and New Data Requirements Are Underway

Based on the updated Cooperative Agreements between the Commission and CNAs, the Commission anticipates having access to relevant program data and the new CNA electronic data systems October 1, 2025. During the Cooperative Agreement negotiations between the Commission and the CNA's, the DWG was created and implemented by the Commission, with participation from SourceAmerica and NIB. The DWG was created to discuss and determine the appropriate data points needed for the dashboards to fulfill the Commission's needs. Therefore, clear and consistent communication between the Commission and DWG is essential to ensure that the relevant data is collected and displayed in the Commission's data dashboards.

During our review, the Commission and DWG had limited communication with one another. The OIG observed that the Commission had an opportunity to improve their communication and resource efforts with the CNAs and DWG regarding the ongoing development of the dashboards. During interviews with the OIG, Commission and CNA leadership said that the DWG was determining what type of data would be displayed on the dashboards and they believed that the DWG was actively making progress toward the completion of the dashboards. However, during our discussion with the DWG, the OIG found that DWG was not actively meeting with the Commission or collaborating on the data dashboards but instead was being used to facilitate contact between the Commission and various CNA departments. As a result, there was a communication breakdown between the Commission and the DWG, causing a delay in the functionality of the DWG.

At the time of our evaluation, the DWG stated that they did not have a clear understanding of how the Commission intends to use the data it wants included in the data dashboards. The OIG also observed that the updated Cooperative Agreements did not provide detailed information on the Commission's expectations for the dashboards; specifically, what information should be depicted or how they would be used. Additionally, the Cooperative Agreements outlined only high-level expectations for the new data collection methods and requirements. The Commission clarified that it sets the standards and retains full rights to analyze and apply data collected under the Cooperative Agreements. The Commission stated that the CNAs are responsible for collecting and reporting the data and that the Commission will continue to provide insight into its data needs, expectations, and how the data informs the dashboards and oversight priorities.

Although the electronic data collection systems and dashboards are anticipated to be deployed on October 1, 2025, the OIG found no data had been collected in the new electronic systems at the time of our review. The Commission stated it anticipates collecting data using the new electronic

systems for approximately one year so that they have enough data points to ensure they are receiving the appropriate data and identifying various trends and patterns within the data.

After the end of our fieldwork, the Commission said that it has realigned the DWG and implemented a series of changes to improve the functionality of the group and collection of data. The Commission stated that these changes will strengthen its data governance and implementation of the Cooperative Agreements. The Commission also appointed a Chief Data Officer to assist with its data governance and is providing data expectations to the CNAs continuously. Further, the Commission has finalized the data metrics and participated in demonstrations of the CNA's online data collection platforms.

Conclusions

The updated Cooperative Agreements between the Commission and CNAs highlights the focus on increasing data collection efforts. It also provides a holistic view of the ongoing modernization efforts within the AbilityOne Program. Beginning October 1, 2025, program data is expected to be collected through updated forms and displayed via dashboards that will allow the Commission to use real-time data to make decisions about the Program.

Through this evaluation, the OIG observed that if the Commission wants to meet its deadline of implementing the electronic data collection and data dashboard by October 1, 2025, it needed to improve communication with DWG. Specifically, clear communication between the Commission and DWG is needed to ensure that relevant data is displayed on the dashboards once they are created. According to the DWG, discussions about the Commission's intent and use of the dashboards would also be useful.

The OIG shared its observations with the Commission in July 2025. The Commission said that it had started taking steps to increase communication efforts with the DWG by planning to hold regularly scheduled meetings and using a document to track the accomplishment of specific tasks assigned to the DWG and Commission staff. The Commission also indicated that it would provide more clarification to the DWG about data needs and expectations. The Commission said that the success of the DWG has expanded its role and that it will be used for additional data initiatives moving forward. This should allow the Commission, CNAs, and DWG to ensure that progress is being made toward the implementation of the new data collection requirements.

Management's Response and Our Evaluation

The Commission concurred with our report and recommendations and stated that it has taken significant steps toward its data collection efforts. We commend the Commission's efforts to modernize its data collection. See Appendix A for the Commission's Management Response.

Specifically, the Commission indicated that our report reflects conditions only through early June 2025, however, we discussed our findings with the Commission on July 31, 2025. At the July meeting, the Commission did not provide updates on the progress it had made with the DWG, toward the collection of the electronic data, or the creation of the dashboards. However, within its management response, the Commission indicated that it initiated a series of changes in June and July to strengthen its data governance and Cooperative Agreement implementation. For instance, the Commission stated that it realigned the DWG, by holding bi-weekly meetings with structured agendas, metric tracking, and deliverables, hired a Chief Data Officer, finalized the metrics for CNAs to report, observed the CNAs' electronic data collection platforms, and is in process of identifying 15 to 20 Key Performance Indicators (data points) to be highlighted in the data dashboards. The Commission also stated that it intends to maintain active collaboration with the CNAs, including the DWG, to reinforce the value of the Commission's data collection efforts to advance the Mission of the AbilityOne Program and demonstrate the impact of the Program to key stakeholders.

We appreciate the Commission providing this additional information in its management response and have updated the report as needed. The updates provided by the Commission in its management response should ensure that progress is being made toward the implementation of the new data requirements, as specified in the Cooperative Agreements. These steps should allow the Commission, CNAs, and DWG to ensure that progress is being made toward the implementation of the new data collection requirements.

The OIG will conduct a follow-up review in the future to determine if the Commission has access to the necessary data that NPAs collected and if the Commission is reviewing such data.

Appendix

Appendix A Management Comments



U.S. ABILITYONE COMMISSION

355 E STREET SW, SUITE 325
WASHINGTON, DC 20024

September 11, 2025

MEMORANDUM FOR THE INSPECTOR GENERAL

FROM: Kimberly M. Zeich, Executive Director

SUBJECT: Management Response – Draft Report: *Access to AbilityOne Program Data*

On behalf of the U.S. AbilityOne Commission (Commission), thank you for the opportunity to review the draft report *Access to AbilityOne Program Data*. We appreciate the professional and constructive approach your team took during the evaluation and the time and resources devoted to this important topic.

The OIG evaluation period was April through July 2025. The draft report reflects conditions primarily from April through early June, before the Commission initiated a series of changes in June and July to strengthen data governance and Cooperative Agreement implementation. We are pleased to elaborate on these actions and additional steps taken in July and August, which demonstrate the Commission's progress. Specifically:

- **DWG Realignment (June 2025):** The Data Working Group (DWG) was realigned under Commission leadership, with structured agendas, metrics tracking, and deliverables. The DWG now meets bi-weekly and serves as the Commission-led body for coordinating data requirements with CNAs.
- **Chief Data Officer Appointment (June 6, 2025):** The Commission appointed its first CDO to strengthen leadership and accountability for data governance.
- **Metrics Finalization (July–August 2025):** The Commission provided CNAs with 300+ metrics tied to Forms 1–3; through DWG review and concurrence, all metrics and formulas were finalized.
- **CNA Platform Prototypes (Aug–Sept 2025):** SourceAmerica (Aug. 26) and NIB (Sept. 4) demonstrated their online platforms, consistent with Cooperative Agreement requirements. Both CNAs have initiated user testing with NPAs.
- **Executive Dashboard Development (ongoing):** The DWG is currently identifying 15–20 Key Performance Indicators (KPIs) to be highlighted in the Commission's Executive Dashboard, which will begin displaying data in January 2026 after the first quarterly submissions.
- **Provide Data Expectations (ongoing):** The Commission will maintain active collaboration with the CNAs, including the DWG, to reinforce the value of dashboards and other data collection efforts. These tools are vital for advancing the mission of the AbilityOne Program and demonstrating its impact to key audiences: Federal customers (e.g., AbilityOne Representatives [ABORS]), significant customer agencies, the disability advocacy community, and other stakeholders.

U.S. ABILITYONE COMMISSION

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We also wish to clarify that the DWG was established by the Commission and is Commission-led, with CNA participation to support the implementation of the Cooperative Agreements. Since June 2025, the DWG has been under the direct leadership of the Commission's Acting Compliance Director and Chief Data Officer, operating with structured agendas, defined deliverables, and task tracking.

We concur with the draft report's recommendations and emphasize that the Commission has already taken significant steps to build the required data infrastructure. We look forward to working with your office as we continue implementing the Cooperative Agreements, strengthening data governance, and ensuring timely, reliable data to support the Commission's oversight responsibilities.

**KIMBERLY
ZEICH**

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KIMBERLY ZEICH
Date: 2025.09.11
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Kimberly M. Zeich
Executive Director

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U.S. AbilityOne Commission

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