



OVERSIGHT PLAN

2026



**U.S. ABILITYONE COMMISSION
OFFICE OF INSPECTOR GENERAL**



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

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

January 26, 2026

MEMORANDUM

TO: Christina Brandt
Interim 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

SUBJECT: Office of Inspector General Oversight Plan for Calendar Year 2026

We are pleased to provide the following Office of Inspector General (OIG) Oversight Plan for Calendar Year 2026. This risk-based plan intends to serve as a roadmap for the OIG's independent and objective oversight of the U.S. AbilityOne Commission's programs and operations.

Enclosure: Oversight Plan Calendar Year 2026

cc:

Kelvin Wood
Chief of Staff
U.S. AbilityOne Commission

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Introduction

We are pleased to present our oversight plan for the 2026 calendar year. This risk-based plan intends to serve as a roadmap for independent and objective oversight of the U.S. AbilityOne Commission's (Commission) programs and operations through reviews, audits, evaluations, and investigations. Our audit, evaluation and investigative teams prioritize oversight of nearly \$4 billion funds that are disbursed through the AbilityOne Program (Program) and the AbilityOne Commission. The goal is to prevent and detect fraud, waste and abuse, and enhancing economies and efficiencies in AbilityOne and its programs.

In the last year the OIG underwent reorganization. The Office of Audit and Office of Evaluation merged into the Office of Audit and Evaluation with the former head of Evaluation leading the combined office. The Office of Investigation is now under the leadership of the Counsel to the OIG. The new organizational structure provides the OIG with the flexibility to respond and produce timely oversight products. Also, each office modified its planning procedures to ensure a more uniform approach for all facets of the OIG and increases communication across the entire office.

Throughout the oversight cycle, the OIG will continue to focus on high-risk areas in the program and operations. Our process to assess and prioritize the planned work include but are not limited to, assessing the top management and performance challenges, congressional interests, key risks for which the Commission and other stakeholders expressed concern, and the results of our prior work. We then used this information to inform the design of our oversight reviews for usefulness to the Commission for its work and operations.

During the oversight cycle we may reassess and adjust this plan to ensure that we continue to focus our resources on the highest risks and impact areas. I am happy to address any questions or comments regarding OIG oversight.

Sincerely,

Carla Smith,
Acting Inspector General



Summary of OIG Strategic Plan Goals

Goal 1- IMPACTFUL OVERSIGHT

- The OIG provides impactful oversight products that promote efficiency and effectiveness of the Commission's programs so that the intended participants are better served.

Goal 2- EFFECTIVE COMMUNICATION

- The OIG staff communicates effectively with its stakeholders and provide awareness of the OIG activities and functions.

Goal 3- EFFECTIVE AND STRATEGIC OUTCOMES

- To implement ethical standards and data for informed decision making.

Goal 4- ENGAGED WORKFORCE

- To ensure OIG staff members are highly trained and are engaged professionals who effectively contribute to the OIG's mission.

2026 Calendar Year Engagements

Audit and Evaluation

The OIG conducts audits and evaluations mandated by legislation, such as the Financial Statement audit and Federal Information Security Modernization Act (FISMA) audit, as well as risk-based oversight engagements of the Commission and Program that considers its functions, major activities, program priorities, and challenges it faces, to identify ways to improve systems and operations. Our audits and evaluations help ensure that financial, administrative, and programmatic activities are conducted effectively, efficiently, and in compliance with applicable laws, rules, and regulations.

The following sections provide snapshots of our statutorily mandated and planned discretionary projects for the 2026 oversight cycle.

Statutorily Mandated Engagements

1. Fiscal Year 2026 Financial Statement Audit (FSA)

The Chief Financial Officers (CFO) Act of 1990, P.L. 101-576, as amended by the Government Management Reform Act, P.L. 103-356, requires 24 major agencies of the Federal Government to prepare and submit audited financial statements. For those Federal entities not covered by the CFO Act, the Accountability of Tax Dollars Act of 2002, P.L. 107-289, requires those Federal agencies and entities to prepare and submit audited financial statements to the Office of Management and Budget (OMB) and Congress. The OIG contracts with an independent public accounting firm to conduct the audit and the OIG provides oversight as required by the IG Act of 1978, as amended. The objective of the audit is to provide an opinion on whether the Commission's financial statements are presented fairly, in all material respects, in accordance with U.S. generally accepted accounting principles. This work is scheduled to start in the second quarter of the 2026 oversight cycle.

2. Fiscal Year 2026 Federal Information Security Modernization Act (FISMA) Review

The Federal Information Security Modernization Act of 2014, P.L. 113-283, amended the Federal Information Security Management Act of 2012 to strengthen Federal cybersecurity. FISMA 2014 clarified the OMB oversight authority over Federal agency information security practices and codified the responsibility of the Department of Homeland Security (DHS) to administer the implementation and reporting of compliance requirements. FISMA requires the OIG to conduct an annual independent evaluation to determine the effectiveness of the information security program and practices of the Commission. The OIG oversight ensures that the contractor follows the methodology established by CIGIE, OMB, and DHS for the Fiscal Year 2026 IG FISMA

Reporting Metrics. The OIG contracts with an independent public accounting firm to conduct the review and the OIG provides oversight as required by the IG Act of 1978, as amended. The objective of the review is to assess the effectiveness of the Commission's information security program and practices across the five key functional areas in the National Institute of Standards and Technology (NIST) Cybersecurity Framework: identify, protect, detect, respond, and recover. Currently the IG metric reporting process is based on a multiyear cycle, reviewing metrics designated as core metrics annually, and supplemental metrics at least once every two years, as established by the Council of the Inspectors General on Integrity and Efficiency (CIGIE), in coordination with the Office of Management and Budget (OMB), the Department of Homeland Security (DHS), and the Federal Chief Information Officers and Chief Information Security Officers (CISO). This work is scheduled to start in the second quarter of the 2026 oversight cycle.

3. Risk Assessment of the Commission's Use of Charge Cards

The Government Charge Card Abuse Prevention Act of 2012, P.L. 112-194 (Charge Card Act) requires the OIG to conduct periodic risk assessments of their agencies' charge card programs to analyze the risks of illegal, improper, or erroneous purchases. The Charge Card Act requires the OIG to use a risk assessment to determine the necessary scope, frequency, and number of OIG audits or reviews of charge card programs. The Charge Card Act also requires Federal agencies to establish and maintain safeguards and internal controls for purchase cards, convenience checks, travel cards, and integrated cards. The objective of the risk assessment is to analyze and identify the risks of illegal, improper, or erroneous purchases and payments within the Commission's charge card programs to determine whether an audit is warranted or make recommendations and identify areas of risk that the Commission could improve to strengthen its charge card programs. Our last risk assessment was completed May 4, 2022. This work is scheduled to start in the second quarter of the 2026 oversight cycle.

4. Top Management Challenges Report

In accordance with the Reports Consolidation Act of 2000 (Public Law 106-531), OIG will submit its annual statement summarizing the areas considered to be the most serious management and performance challenges facing Commission. Management and performance challenges are defined as programs or management functions that are vulnerable to waste, fraud, abuse, and mismanagement and where a failure to perform well could seriously affect the ability of Commission to achieve its mission objectives.

5. Semiannual Reports to Congress

Under the Inspector General Act of 1978, as amended, OIG is required to publish a semiannual report to Congress. In 2026, OIG will issue these reports for the preceding six-month periods ending March 31, 2026, and September 20, 2026.

Discretionary Engagements

6. Audit of the Central Nonprofit Agencies' Use of AbilityOne Program Fees

AbilityOne Program Fees are paid by Commission-authorized Nonprofit Agencies (NPA) to Commission-designated Central Nonprofit Agencies (CNA) based on NPA sales to government customers. The primary purpose of the Program Fee is to advance employment opportunities for participating employees, facilitate the delivery of satisfactory products and services, and to satisfy the requirements and responsibilities in AbilityOne regulations, policies, and Cooperative Agreements. The Commission requires the CNAs to provide a proposed Program Fee Rate and Projected Program Related Expenditures report and other information to reasonably estimate the CNAs' expected costs to facilitate and maintain the AbilityOne Procurement List requirements and related administrative expenses. The OIG contracted with an independent public accounting firm to perform an analysis of the history and function of the Program Fee; however, the OIG has not reviewed the CNAs' use of the Program Fee. Therefore, the OIG intends to initiate an audit of the CNAs' use of Program Fees. Our audit objective is to determine whether the Central Nonprofit Agencies' use of AbilityOne Program Fees is consistent with the U.S. AbilityOne Commission requirements. Specifically, we will assess whether Program Fee expenditures are properly supported and advance the objectives of the AbilityOne Program. This work is scheduled to start in the fourth quarter of the 2026 oversight cycle.

7. Evaluation of Product Quality

The Cooperative Agreements, executed in December 2024, require the U.S. AbilityOne Commission's Central Nonprofit Agencies to develop procedures for collecting information about quality complaints and for providing that information to the Commission. The Commission and CNAs do not have customer feedback data but have expressed interest in better understanding customer satisfaction. The current Federal Acquisition Regulations exempt purchasers of AbilityOne products and services from providing performance feedback. However, the Department of Defense and General Services Administration have issued class deviations requiring past performance information. This indicates a potential trend toward incorporating performance feedback into AbilityOne contracts to ensure accountability and quality. This survey would provide valuable data to the Commission to help inform strategic decisions and policies. The survey would also provide a baseline metric about the progress of the Program, for planning and program management efforts. The start of this evaluation is dependent upon the OIG obtaining a contractor or procuring appropriate software to conduct a survey of AbilityOne government customers to determine a baseline satisfaction level of the Program products and services.

Additional Audit Work

8. Peer Review of the U.S. Capitol Police OIG

The U.S. Government Accountability Office's Generally Accepted Government Auditing Standards (GAGAS) require that audit organizations that conduct engagements in accordance with GAGAS to establish and maintain a system of quality control and obtain an external peer review at least once every three years. The system must be designed in a way to provide reasonable assurance that the organization and its personnel comply with professional standards and applicable legal and regulatory requirements. The Inspector General Act of 1978 requires peer reviews of an OIG to be performed by an audit entity of the Federal Government. The reviewing members and members being reviewed need to be independent. The Council of the Inspectors General on Integrity and Efficiency sets the standards, policies, and procedures and schedules each OIG's peer review along with determining the OIG that will conduct the peer review. The OIG has been selected to conduct the peer review of the U.S. Capitol Police OIG for the period ending September 30, 2025. This work is scheduled to start in the second quarter of the 2026 oversight cycle.

Investigations

The Office of Investigations (OI) will continue its mission to investigate possible violations of statute, regulation, or policy in the administration of the AbilityOne Program. OI is an operational component of the OIG, whose function is to provide oversight as required by the IG Act of 1978, as amended. The subject of an investigation may range from a Commission employee, contractor, consultant, CNAs, NPAs, or a person or entity involved in alleged wrongdoing affecting the AbilityOne Program and operation. Thus, investigations may be criminal, civil, or administrative, and may result in penalties and monetary recoveries.

The OIG works with state and federal law enforcement partners to conduct investigation. In the case of potential criminal misconduct, OI may refer the findings to the Department of Justice for prosecution. Investigations are conducted in accordance with professional guidelines established by the Attorney General of the United States and with Council of the Inspectors General on Integrity and Efficiency Quality Standards for Investigations. As such, the OIG does not provide updates or summaries regarding open investigations and does not make final reports of investigations public. In accordance with the OIG strategic Plan the OIG hopes to engage in outreach to educate the AbilityOne and program employees about Whistleblower Protection and the functions of the OIG.

Hotline

The OIG Hotline serves as a key operational function for reporting potential violations of laws and regulations relating to the AbilityOne Program. It allows AbilityOne employees, contractors, subcontractors, grantees, subgrantees, and personal services contractors and the public to communicate directly and confidentially with the OIG. The identities of complainants and witnesses are protected pursuant to the IG Act. The OIG takes all complaints seriously; as such, we carefully analyze all complaint details to determine whether an investigation is warranted. Other courses of action may include a referral to management for action, referral to another existing program/process, referral to another agency, referral to the audit or evaluation process, or closed and dismissed with no further action. The OIG will continue to thoroughly analyze each complaint and respond accordingly.

Report Fraud, Waste, and Abuse

Please submit complaints using our Portal <https://abilityone.oversight.gov/hotline>

You may also submit a complaint via our Hotline Toll-Free Number: 844-496-1536, or

Email: hotline@oig.abilityone.gov

Read all OIG reports on our website:
abilityone.oversight.gov/reports/all



Office of Inspector General

U.S. AbilityOne Commission

Committee for Purchase from People Who Are Blind or Severely Disabled (CPPBSD)

355 E Street, S.W. (Suite 335)

Washington, DC 20024

abilityone.oversight.gov

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