



Empowering People who are Blind or Visually Impaired with Opportunities to Seek Independence

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August 19, 2016

Federal Acquisition Regulation:
Strategic Sourcing Documentation
48 CFR Parts 8 and 13
[FAR Case 2015-015; Docket No. 2015-0015; Sequence No. 1]
Attn: Ms. Flowers

Dear Ms. Flowers:

The Cincinnati Association for the Blind and Visually Impaired (CABVI) is providing comment on the proposed rule requiring documentation of purchases of supplies or services by the Federal Government when the Federal Supply Schedule Initiative, or FSSI, is not utilized.

CABVI was founded in 1911 to provide vocational opportunities to men who were homeless and blind in Cincinnati. Our mission today is "Empowering people who are blind or visually impaired with opportunities to seek independence". CABVI provides those opportunities through an extensive array of services and employment opportunities for individuals who have severe vision loss in a myriad of ways, through accommodation, training, advocacy, support **but most of all, through employment**. We generate jobs from manufacturing, to retail to contractual monitoring. CABVI is one of the 90 associated non-profit agencies (NPAs) affiliated with National Industries for the Blind (NIB), a part of the nation's largest employment resource for people who are blind and visually-impaired. Of those 90 plus NPAs, we are one of 20 who operate U.S. AbilityOne Base Supply Centers (BSCs), operating the BSC at Wright Patterson Air Force Base near Dayton, Ohio.

Our BSC is an essential part of agency's business and employment model. Through it we are able to accomplish our agency's mission while pursuing the following objectives:

- Meaningful employment of people who are blind
- Distribution of high quality, competitively priced products made by people who are blind to federal customers under the U.S. AbilityOne Program, established under the Javits-Wagner-O'Day Act (JWOD)
- Support to our military personnel through the provision of quality products at good values

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Member, National Industries for the Blind • Member, National Association for the Employment of People Who Are Blind • Accredited Member, National Accreditation Council for Blind and Low Vision Services • An Equal Opportunity Employer/Affirmative Action Employer • Funded by United Way

- Providing exceptionally responsive and personalized customer service. BSC personnel work closely with leaders at respective locations to develop the menu of products that best serve their needs
- Creating opportunities to employ not only blinded veterans, but veterans and military spouses when we are not able to fill the job with a qualified employee who is blind

In light of the remarkable success of the AbilityOne BSC program both on employment of people who are blind and on ensuring that our service members are equipped with high quality products at a good value, we are asking that all purchases of AbilityOne and SKILCRAFT® products and services, and all purchases through AbilityOne Base Supply Centers, be exempted from the requirements of Section 836 of the Carl Levin and Howard P. “Buck” McKeon National Defense Authorization Act for Fiscal Year 2015 (NDAA) (Pub.LO.113-291).

This proposed requirement is potentially harmful to the AbilityOne BSC system. Specifically, we are concerned about:

- The creation of unnecessary barriers for government purchasers who are currently being well served by the AbilityOne Base Supply Center system
- The potential negative impact on employment opportunities for people who are blind who work either at the BSCs or at one of the non-profit agencies manufacturing and assembling the products sold through the BSCs
- The fact that FSSI contracts allow commercial products that are known as “Essentially the Same (ETS), not actual quality products made by people who are blind or who have significant disabilities to be substituted for quality AbilityOne products. These products are in violation of both federal statutes and regulations and should not be allowed.
- FSSI purchases not supporting existing the JWOD mandatory purchase laws, the Buy American Act, or Berry Amendment requirements

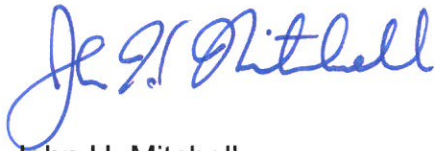
In addition to cost savings, **one of the goals of Strategic Sourcing is to explore ways in which the initiative can assist with socioeconomic goals.** According to the American Foundation for the Blind, American adults who are blind face unemployment rates exceeding 65%. Adhering to purchases of products that are made and distributed through the AbilityOne Program supports achieving improved socioeconomic goals.

We strongly feel that the goal of increasing cost savings should not come at the expense of employment opportunities for thousands of Americans who are blind or have significantly disabilities and are gainfully employed through the AbilityOne Program.

Again, we ask that the Federal Government continue to support the employment of people who are blind by exempting purchases of AbilityOne, SKILCRAFT® and all other purchases through AbilityOne Base Supply Centers from the requirements of Section 836 and the related final rule change to the Federal Acquisition Regulation.

Thank you for your attention to this highly important issue.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "John H. Mitchell". The signature is fluid and cursive, with the first name "John" being particularly prominent.

John H. Mitchell
CEO

JHM:ae