



National Industries for the Blind

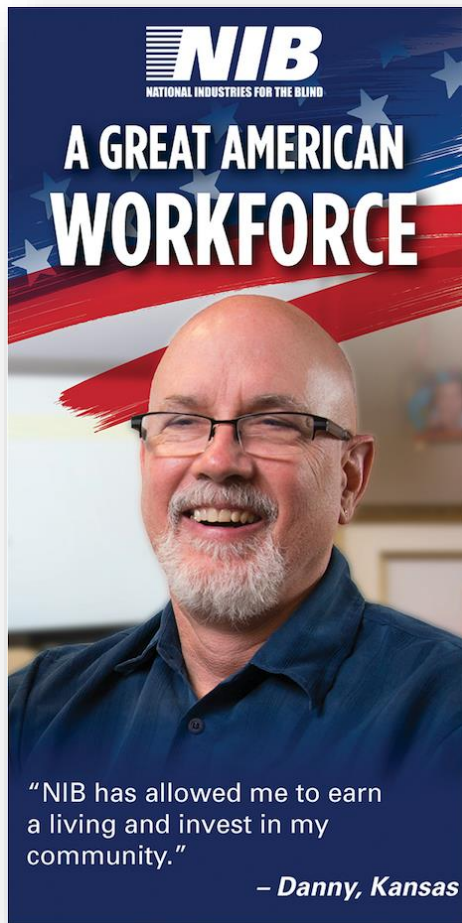
Advocacy Awareness Campaign



Campaign Goals

- **Educate elected officials and policymakers** about the value of NIB and the work of associated agencies.
- **Mitigate negative perceptions** about NIB and associated agencies and the work you do.
- **Not a national public education campaign**

Reaching Key Audiences



- **Direct communications.** Deploy a steady drumbeat of social media, email, and direct mail (postcards) that coordinates with and augments your shoe-leather lobbying.
- **Precise digital advertising.** Target ads to people connected to policymakers and near key buildings, like the Capitol.
- **Interpersonal communication.** Facilitate conversations between stakeholders and policymakers.

Research Approach

1. Social and Earned Media Scan
2. Listening Session
3. Policymaker Listening
4. Perception Testing
5. Message Testing (pending)

1. Media Scan Findings

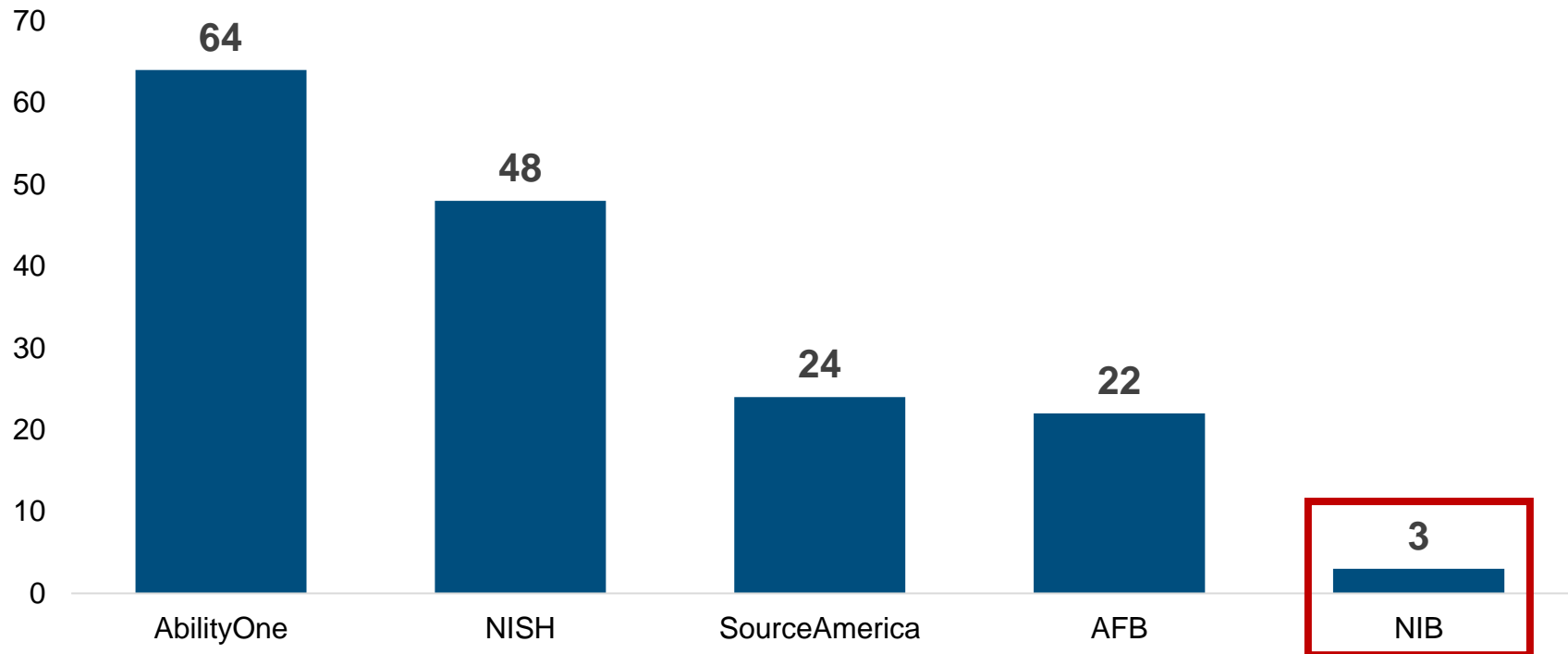
- **Discussions are neutral or positive** about NIB, SKILCRAFT, and AbilityOne.
- Discussions are **not uniformly positive** on “employment for people with disabilities.”
- Conversation volume is low, but **NIB is at risk** of being associated with the negative narrative.

2. Listening Session Takeaways

- **Jobs:** There may be an outdated “legacy” notion about the value of government employment programs for people who are blind or disabled.
- **AbilityOne:** There may be negative connotations about the AbilityOne Program and its providers.
- **NIB:** There may be a lack of understanding about NIB and its network of associated agencies

3. Policymaker Listening Findings

Year-to-Date Mentions on Social Media by Policymakers (via Quorum)

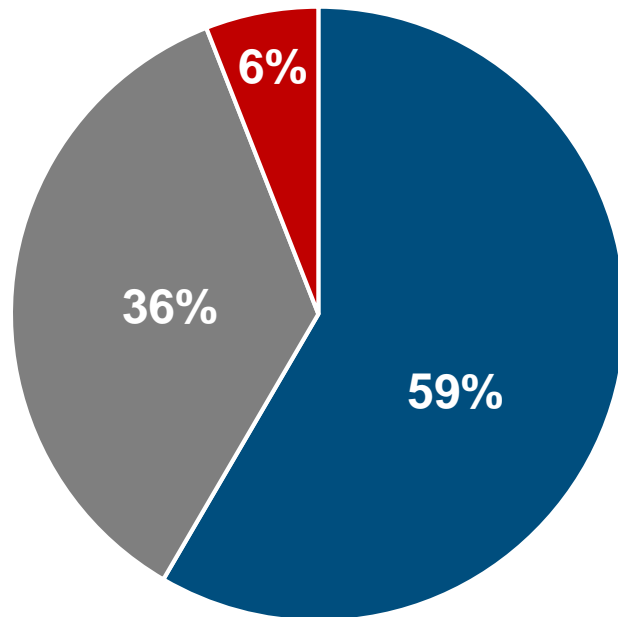


4. Perception Testing Findings

1. There is **strong support** for the government creating jobs for people who are blind or disabled.
2. NIB is viewed favorably and does not appear to be **painted in a negative light** due to allegations against related organizations.
3. NIB has **many positive attributes** about which you can communicate.

Finding #1: Strong support for creating jobs

Which of the following do you agree with most when it comes to creating employment for people who are blind or severely disabled? (among D.C. opinion leaders)



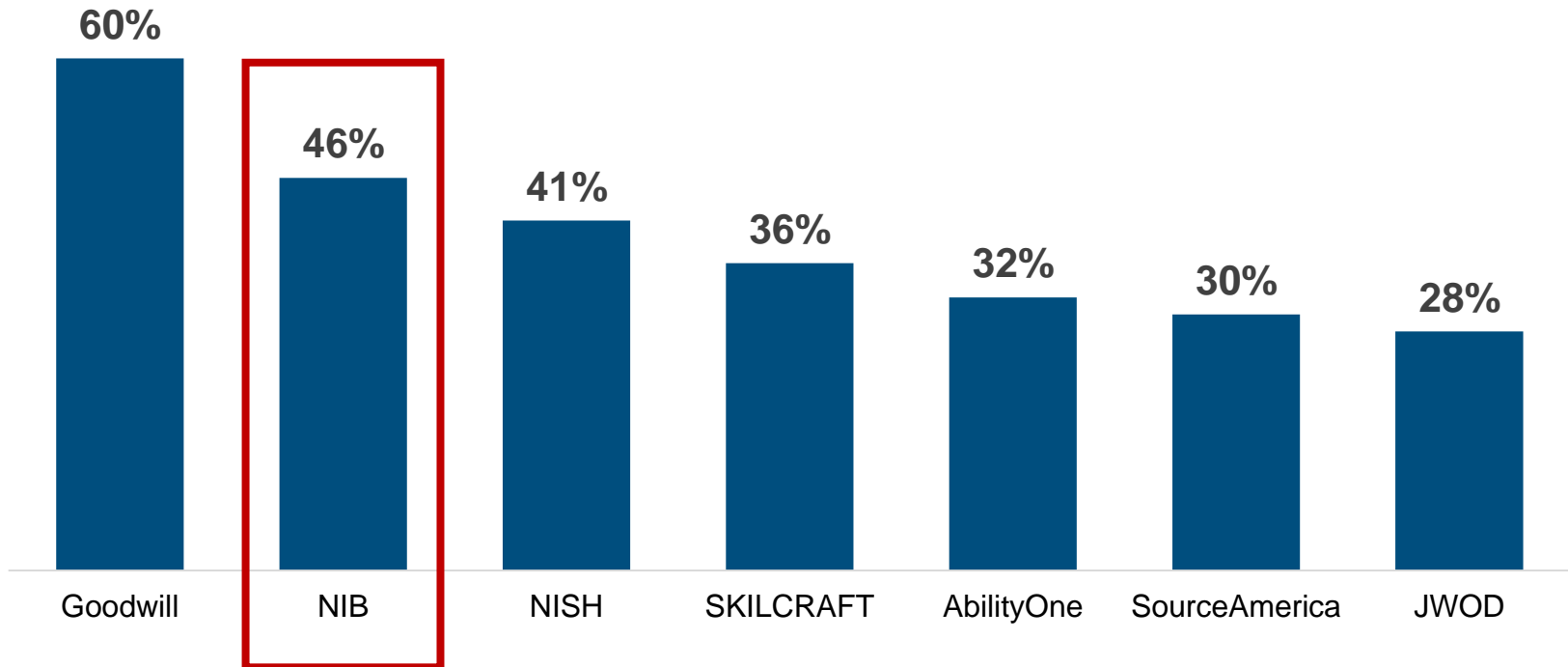
“Well, they seem to have a very positive impression in the sense that folks who can’t usually gain employment are employed and benefitting our state and nation.”

– Republican Congressional District Director

- The federal government should do more
- The federal government is doing about the right amount
- The federal government should do less

Finding #2: Favorability (landscape)

How favorable is your opinion of each of the following programs/organizations/brands?
(displaying % “very favorable” for D.C. opinion leaders)



Finding #3: Attributes (the work you do)

Please read the attributes below and indicate how well each applies to the NIB brand. Please rate them on a 10-point scale, where 10 means “applies completely” and 0 means “does not apply at all”.
(Displaying results for D.C. opinion leaders)

Overall (among D.C. opinion leaders)	Mean	% Don't Know	% 8, 9, 10	% 0, 1, 2
Helps improve employment opportunities for people who are blind	8.71	14	70	1
Advocates for the rights of people who are blind	8.64	17	68	0
Provides people who are blind with opportunity for personal and professional growth	8.64	16	67	0
Helps people who are blind achieve success	8.49	14	66	0
Helps people who are blind achieve personal and economic independence	8.48	15	66	0
Offers job and skills training for people who are blind	8.44	14	64	0
Helps people who are blind advance in their careers	8.42	16	64	0
Provides jobs for people who are blind across various industries	8.36	16	63	0
Creates innovative solutions for people who are blind	8.35	18	60	0

What does it all mean?

- **Increase the volume** – Minority voices have impact because of the low volume of communications about your work. Drown them out with positive stories.
- **Double down** – “Blind” is more specific than “disabled.” Draw a sharp line of distinction between you and others in this area.
- **Go on the offense** – NIB has a huge reservoir of goodwill from which to draw. Use that political capital to advance your agenda.

Next Steps

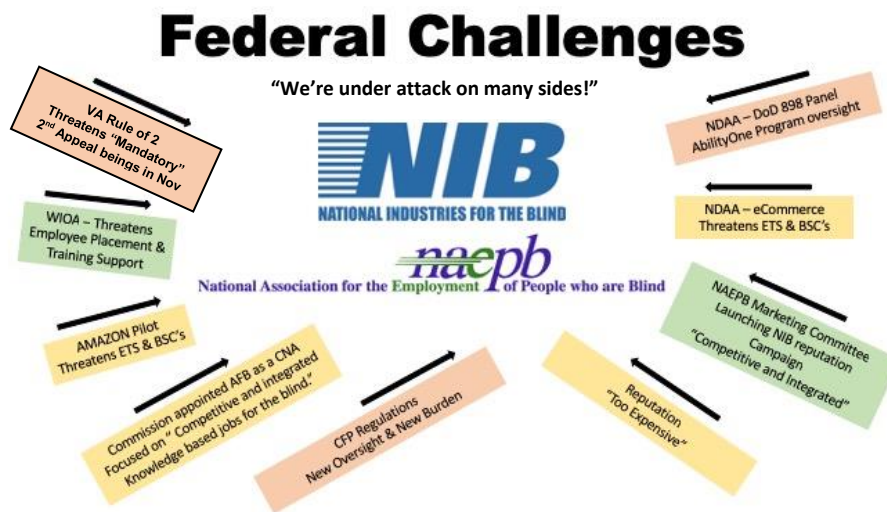
- Message Testing
- Strategic Planning
- Collateral Development
- Campaign Launch

We're on a Mission. Yours.



NAEPB Member Agencies,

At the June 25, 2018 NAEPB Board Meeting there was discussion regarding all the various risks that surround our Program. As a result, the board suggested we consider the possible need for NAEPB to support its own public policy initiative. There was a call for an Ad Hoc committee to explore the ways to fund such an initiative. There were three NAEPB board members who volunteered to undertake the task. They were Rudy D'Amico, Jim Kerlin and Lou Moneymaker. As this committee conducted its meetings, there was significant discussion regarding the "threats" surrounding our program. This is captured in the following illustration.



The first thing our committee discussed was the structure of the current public policy program that represents both NIB and NAEPB. NIB holds and funds a contract with the Signal Group providing services for both NIB and NAEPB. NIB also holds and funds a contract for specific services from Todd Tiaht. NAEPB holds and funds a contract for specific services with Todd Tiaht. The BSC's hold and fund a contract for specific services with Todd Tiaht. Our committee feels we have too many contracts out there for various public policy initiatives, and there can be ineffectiveness in funding these various contracts, as well as danger in "the right hand not knowing what the left hand is doing." Furthermore, we discussed how toxic the environment has become for our program, and our committee understands the vulnerability this may create for NIB. As a separate, stand-alone organization that governs itself, many times NAEPB can speak more loudly and more aggressively regarding the burning issues that surround our program than can NIB. We hasten to add that our expectation is the public policy programs of NIB, with the Signal Group, and NAEPB, with Todd Tiaht, will collaborate on most issues but may need to act differently in implementing solutions to the threats that surround us. Without going into further detail, our committee sees a definite need and advantage for NAEPB to have its own representation for public policy; therefore, we recommend the NAEPB board and membership support this initiative.

As a result of our conclusions regarding the establishment of a separate but coordinated public policy program with NIB, we clearly understand the necessity for additional NAEPB funding. To create the additional revenue, we are proposing a tiered dues structure and assessments to support funding our

own public policy initiative, as well as providing funding for all other expenditures that may come before NAEPB. The following chart explains how we can financially support this effort.

NAEPB ANNUAL DUES PROPOSAL

NOVEMBER 2018

APPROXIMATE NUMBER OF AGENCIES	ABILITY ONE SALES (Does Not Include BSC Revenue)	DUES AMOUNT	TOTAL CATEGORY AMOUNT
20	Under 4M	\$ 600.00	\$12,000
15	4M - 10M	\$900.00	\$13,500
12	10M - 20M	\$1,500.00	\$18,000
5	20M - 35M	\$3,000.00	\$15,000
6	35M +	\$4,000.00	\$24,000
		TOTAL DUES	\$82,500

*In addition, NAEPB would invoice each BSC operating agency an amount of \$200.00 per BSC per year (Based on 165 BSC's). This would replace the current assessment that funds the Todd Tiaht contract with the BSC's.

TOTAL REVENUE		EXPENSES	
Annual Dues	\$ 82,500	Joint Public Policy Funding	\$108,000
BSC's	\$ 33,000	Legal & Other Additional Expenses	\$ 21,500
NIB Donation	\$ 24,000	Annual General Expenses	\$ 10,000
TOTAL:	\$139,500	TOTAL:	\$139,500

Our committee feels this is a fair and equitable method for funding a new dues structure. Article III, Section 6, of the NAEPB Bylaws states, "Each member organization shall pay annual dues as established

from time to time by the Board of Directors.” At this time however, we recommend both the NAEPB board and membership support this dues proposal.

Our committee would like to share some final thoughts with you. The threats to our Non Profit Agencies (NPA's) presented in this document are **REAL!!!**, and they are numerous. These are issues we must treat in a much more aggressive manner than in the past, and we need to be much more nimble than we are currently. In having its own public policy representation, NAEPB can move forward in a more focused and cost effective manner with measurable results. Our committee knows each and every one of you is passionate about the opportunities we have been able to provide for people who are blind or visually impaired over the past 80 years, and that you are just as passionate about being able to continue our critical mission into the future. Knowing the threats around us, we ask for your support of the recommendations we have put forward.

Respectfully,

Rudy, D'Amico
Jim Kerlin
Lou Moneymaker



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November 5, 2018

The Honorable Shay D. Assad
Principal Director, Defense Pricing and Contracting
Chair, Panel on the Department of Defense and AbilityOne Contracting
Oversight, Accountability, and Integrity
Washington, DC 20301-3060

Dear Mr. Assad:

Thank you for the opportunity to provide a response from National Industries for the Blind (NIB) and National Association for the Employment of People Who Are Blind (NAEPB) to the recommendations of the 898 Panel (Panel on the Department of Defense and AbilityOne Contracting Oversight, Accountability, and Integrity).

The Department of Defense and the military branches are our largest and most important customer, and we support this work to ensure there is integrity and accountability as our nonprofit agencies provide vital products and services in support of the warfighter.

Many of the 41 recommendations contained in 2018 First Annual Report to Congress will require either regulatory or legislative action to implement, and this will not be a quick process. It is essential that the Central Nonprofit Agencies (CNAs) and associated Nonprofit Agencies (NPAs) have the opportunity to engage in in-depth discussions with members of the 898 Panel to better understand why certain recommendations were made and so that agencies and front-line employees can better explain current operations and processes at these agencies.

In the meantime, we would suggest focusing on those recommendations where there is greater clarity and support, and which can be implemented more readily. These recommendations would include, but not be limited to:

- Subcommittee One and compliance/training
- Subcommittee Five, as we favor initiatives that ease the process for qualifying to participate in the program ("presumptive eligibility") as long as they do not dilute the focus of the program from serving those that are the most severely disabled;



- Subcommittee Six recommendation to create a dollar threshold for representations and certifications on contracts; and
- Subcommittee Seven and nearly all the recommendations under Technology, Policy and Training. We strongly support initiatives to enhance the Procurement List and its use by DoD contracting personnel.

Concerning other recommendations that either require regulatory or legislative action to enact, or that we believe to be either difficult to support at this time or in need of greater clarification, here is a brief summary of those areas:

- Restrictions on use of CNA fee revenue for lobbying, as we feel that it is vital for our elected representatives to hear directly from their constituents on matters involving disability employment policies. This issue raises First Amendment concerns and runs counter to a 2013 GAO report validating advocacy by CNAs as appropriate since no federal appropriations are expended;
- Recommendations under Subcommittee Three that appear to be unfunded mandates and require further discussion and illumination;
- Other recommendations contained within Subcommittee Three would appear to be more relevant for agencies serving individuals who are significantly disabled, and we would need greater clarification. The same holds true for several recommendations under Subcommittee Five (Veterans Eligibility), though we favor initiatives that ease the process for qualifying veterans to participate in the program, or “presumptive eligibility”;
- Penalties for CNAs and NPAs for failure to follow policies and procedures;
- Subcommittee Six recommendations need further explanation to better understand impact to agency processes. We are concerned about inserting price/value considerations into the CNAs’ selection process, as it changes the dynamic of the process and diminishes the Commission’s obligation to determine fair and reasonable price. Moreover, we support retaining the evergreen status of procurement list assignments except when there is an issue of nonperformance; and
- Several of the sub-bullet recommendations under Subcommittee Seven (recommendation #7) require expanded explanation so we can better understand how they might impact current operations; and
- There is general concern regarding recommendations that necessitate reopening the JWOD statute, and we would appreciate expanded conversation on this matter.

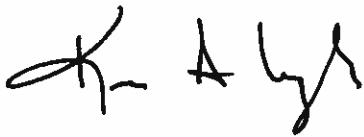
We appreciate having the opportunity to provide our initial feedback on the 898 Panel recommendations, and we look forward to positive conversations that provide greater understanding on all sides and strengthen oversight and integrity within the program. Because of the complexity of the issues, we would be grateful for the chance to brief you in person. In the meantime, we have attached a power point presentation to this letter, which explores some of the key issues.



We would recommend a town hall meeting with NPA's to address questions and hear concerns. We support convening a meeting of the G-5, comprised of the NAEPB, NCSE, NIB, SourceAmerica and the Commission so we can be more actively engaged in discussing the recommendations and seeing how to apply those that can be implemented and to respond to those that raise concerns or do not appear to support the program's goals and mission.

We are confident that all parties have as an end goal strengthening the partnership between the Department of Defense and AbilityOne in a manner that continues to support our nation's men and women in uniform while providing quality employment opportunities for Americans who are blind or significantly disabled.

Sincerely,



Kevin A. Lynch
President and CEO
National Industries for the Blind



Reinhard Mabry
President, National Association for the Employment of People Who Are Blind
President and CEO, Alphapointe, Kansas City, Missouri

Cc: Tina Ballard
Executive Director, U.S. AbilityOne Commission



898 Panel Additional Supporting Documentation

NIB and NAEPB
November 2018



Changes to the Labor Ratio Requirement

- There is strong support for including indirect labor in the labor ratio requirement for AbilityOne producing agencies.
- Because the current labor ratio requirement counts only direct labor hours, it does not recognize all the direct labor employees who are blind and that have received training and professional developmental and who have moved on to indirect labor managerial and supervisory positions – including executive positions.

Changes to the Labor Ratio Requirement continued

As for lowering the labor ratio requirement overall to something less than the current 75%, this certainly has appeal for aligning the program more closely with current disability policy (Competitive, Integrated Employment, or CIE).

- Our community is split over this issue since there is also a realization that by lowering the labor ratio requirement it would more than likely result in fewer people who are blind being employed on AbilityOne contracts. This runs counter to the mission to increase employment for people who are blind.
- Further, by lowering the labor ratio requirement to something significantly less than 50% it is highly likely the small business community would begin to argue that this mandatory purchase program is being given an unfair advantage in the federal marketplace.

Reopening the JWOD Act

- Any of the recommendations that would require reopening the Javits-Wagner-O'Day (JWOD) Act should be considered with great care and with the significant involvement of all the interested parties.
- There are a wide range of opinions concerning the AbilityOne Program and whether or not it should be reformed, how significantly it should be changed, and the value of aligning it with current disability policy.
- Just as it was difficult to reach consensus nearly 10 years ago when Congress convened discussions around JWOD modernization and produced legislation to effect change in the program, it will be just as challenging to reach consensus amongst a wide range of stakeholders and interested parties. Today it will be even more challenging to achieve any form of consensus.

Reopening the JWOD Act continued

- The WIOA (Workforce Innovation and Opportunity Act) Advisory Committee (Advisory Committee on Increasing Competitive Integrated Employment for Individuals with Disabilities) Final Report issued in September 2016 dedicated an entire chapter to AbilityOne and made several reform recommendations.
- Disability advocacy organizations have also put forward their own recommendations, as did a recently-released report from the National Council on Disabilities (NCD).
- It is likely that SDVOSBs would weigh in should the JWOD Act be opened.
- There are also GAO (Government Accountability Office) reports that have been issued with recommendations for changes to the program.
- The 898 Panel recommendations have not been issued in a vacuum and reopening the program's authorizing statute will attract significant interest from organizations with varied interests in either enhancing the program, or potentially even closing it down. Success will be dependent upon the degree to which the process is open and collaborative.

Competition Among NPAs

We agree there must be processes developed and implemented that will allow the customer to better and more quickly resolve any performance or price concerns.

Subcommittee Six (Acquisition and Procurement) raises a number of questions and concerns, and among them are the following:

1. Inserting price and value considerations into the agency selection process has never been a driver of the program. The Commission's responsibility is to determine a fair market price once qualified agencies are approved for new projects.
2. There are a number of serious questions about the rules under which this could work including what would trigger this process and to address things such as remediation and due process.

Competition on the basis of price and value will detrimentally affect blind and disabled employment. Competition on this basis will benefit larger and more experienced nonprofit agencies. Smaller or less sophisticated nonprofit agencies will cease to participate in the program, continuing a trend that has been evident for a decade. Re-competition of assignments will detrimentally affect blind and disabled employment and likely increase costs to the customer as nonprofit agencies ensure they recover their capital and other costs within the contract/assignment term.

Competition Among NPAs continued

3. A number of recommendations within this subcommittee would add cost considerations and would potentially make an already challenging Procurement List addition process even more burdensome without necessarily helping agencies create more jobs for people who are blind.
4. A significant number of concerns are raised around the matter of reassigning projects and then requiring the incumbent agency to assign as many employees as possible to the successor agency; disclosing personnel records; disclosing proprietary financial information; and negotiating the transfer of fringe benefits.

While the goal is commendable, these recommended actions under the category of re-competition could easily be perceived as interfering in internal business and personnel matters of private organizations and run counter to how the program has functioned for the past 80 years.

There are practical considerations to consider – especially for agencies involved in manufacturing products. These agencies are required to make significant capital investments in machinery and re-competing contracts and shifting work is a complex and costly process.

5. The AbilityOne process currently requires NPAs/CNAs to first find a government sponsor and then negotiate an acceptable price with a warranted contracting officer. This negotiated price is then reviewed/approved or rejected by the Commission.

Recommendation to “prohibit use of the program fee for lobbying expenses”

- A May 2013 report from the Government Accountability Office (GAO) – *Employing People with Blindness or Severe Disabilities: Enhanced Oversight of the AbilityOne Program Needed* (GAO-13-457) included language stating unequivocally that NIB does not receive appropriated dollars and therefore is not prohibited from lobbying activities.
- We believe that it is vital for our elected representatives to hear directly from their constituents on matters involving disability employment policies.
- There is an ongoing falsehood perpetuated by detractors who do not support the work of the AbilityOne Program that the CNAs are utilizing appropriated dollars to engage in advocacy. This is false and misleading.
- The CNAs were established by the nonprofit agencies to serve as their representative. This includes representing the agencies and their collective mission on Capitol Hill.

Recommendation to “prohibit use of the program fee for lobbying expenses” continued

- This recommendation also raises First Amendment concerns since these are private organizations seeking to petition elected officials in Congress.
- NIB expends a very modest percentage of its \$30 million annual budget on advocacy activities, and this amount is limited by IRS regulations since NIB is a 501 (c)(3) nonprofit organization.
- With very few exceptions, we advocate on program-wide issues impacting employment for people who are blind and spend the bulk of our time educating Members of Congress and their staffs and debunking myths and misperceptions about the work of our associated NPAs.

NIB's Opportunity Assignment Process overview to the 898 Subcommittee Six: Acquisition and Procurement

NIB and NAEPPB
November 2018



NIB's Board Approved Assignment Process*

The assignment process follows four phases:

- Opportunity Identification
- Opportunity Assessment
- Assignment Process
- Appeals Process

The assignment of an opportunity occurs prior to development of the opportunity. Development includes but not limited to the assessment of impact on industry, Federal Prison Industries waiver request (products only), price recommendation, estimated blind labor hours, and federal agency sponsorship.

Opportunity Identification

- Non Profit Agency (NPA) Identified Opportunities: Assigned to requesting NPA unless the assignment will result in impact to NPA(s) producing or performing a similar project.
- NIB Identified Opportunities: Follows NIB's Assignment procedures highlighted in the subsequent slides

The Assignment Process follows the procedures outlined in U.S. AbilityOne Commission Policy 51.301 Selection of Nonprofit agencies for project assignment and order allocation and NIB Board Policy 6.1 Assignment

Assignment to Addition Success Rate

- NPA Identified Opportunities: On average* 1 out of every 13 opportunities will be developed and added to the PL.
Main reasons for attrition:
 - Lack of Sponsor
 - Lack of commercial partner or supplier
 - Price
 - Item currently under a long term contract
- NIB Identified Opportunities: On average 1 out of every 5 opportunities will be developed and added to the PL.
Main reasons for attrition:
 - Price
 - Lack of commercial partner or supplier

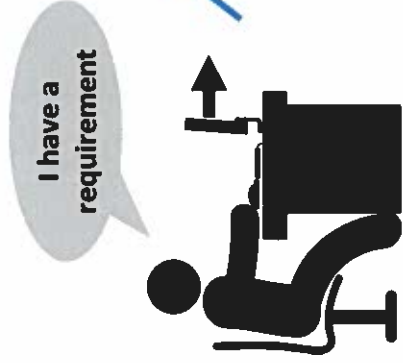
* Average 2017 and 2018 additions results

Opportunity Assessment

- Both NPA and NIB Identified opportunities are evaluated on the below criteria:
 - Assessment of blind labor potential
 - Conflict to existing product/service(Essentially The Same(ETS), line extension, replacement)
 - Confirm product/service is not on procurement list (PL)
 - Confirm product/service is not already assigned
 - Evaluate if product/service is line extension or replacement
 - Evaluate if product/service will adversely impact current sales of an NPA
 - Customer requirements including time to market and geographical location
 - Other considerations for NIB Identified opportunities include
 - Agency in need, small, or emerging
 - Manufacturing and other capacity management
 - Past performance
 - Financial Health of the NPA
 - Qualifications: technical, managerial, personnel

Assignment Process when NIB Identified

Product, Service, or BSC

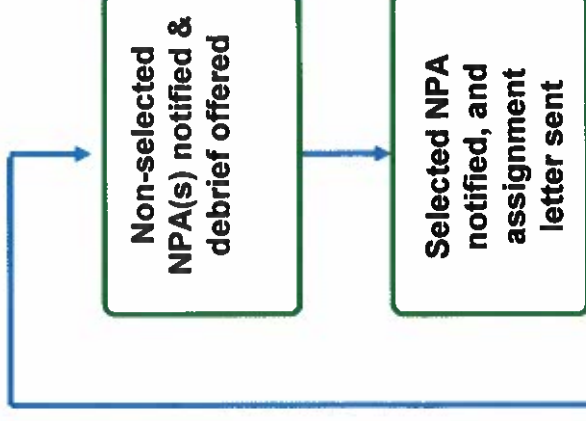


Opportunity Submitted to NIB:
Government customer has a
product/service/BSC opportunity

Assignment Evaluation



Communication



Assignment Process (1 of 2)

- RFI / RFP :
 - Advertised in NIB This Week
 - Detailed response instructions
 - Response deadline
 - Special considerations, if applicable
- Source Selection Board (SSB)
 - Members: Subject matter experts, business development managers, operations support
 - Evaluation training provided to all

Assignment Process (2 of 2)

- **SSB Evaluation Process:**
 - Evaluation factors & weights vary and are clearly defined
 - Proposals are evaluated against the requirement
 - SSB members score independently
 - Scores consolidated into a “scoring matrix”
 - Recommendation:
 - Takes into account any special considerations identified at the beginning of the process
 - Final review of the process and recommendation for procedural compliance is the Vice President of Operations
 - Award
 - All respondents, selected and non-selected, notified via phone and official correspondence
 - Debriefs provided upon request
 - Final award published in NIB This Week

Appeals Process

- Assignment Decision Appeals:
 - Assignment decisions may be appealed within five (5) days of the NPA debriefing
 - Appeals begin with the line of business director, and can be elevated in the following order:
 - Senior Director, Products and Services
 - Vice President, Operations
 - President & CEO
 - NIB Board of Directors
 - AbilityOne Commission
- To date, NIB has received **two formal** appeals. One in 2013 when NIB issued 190 assignments and one in 2018 when NIB issued 195 assignments. Both were reviewed and did not change the decision. Final awards was upheld.
- NPAs always have the right to take concerns to the AbilityOne Commission.

Process Example: NIB This Week Announcement



OPPORTUNITIES AND ASSIGNMENTS

OPPORTUNITIES

[AMENDED JanSan Opportunity: EPA Certified Product Manufacturing, Assembly, and Kitting](#)
Responses due May 3, 2018

ASSIGNMENTS

[Services Assignment: Cincinnati Association for the Blind and Visually Impaired Receives Assignment for USMC Quantico](#)

Delay in Processing Federal Assignment Requests

Quan Leysath, Manager, Product Development Support, NIB
703-310-0458 or gleysath@nib.org

Due to a number of factors, NIB is experiencing a delay in processing requests for federal assignments. Every effort is being made to eliminate this backlog. If you have any questions or concerns, please reach out to Quan Leysath. We appreciate your patience and support as we work through this matter.

Meet the 2018 Employees of the Year!

Unable to attend the 2018 NIB/NAEPB National Symposium? Click on the image below to meet the Employee of the Year nominees in this special video presented at the Awards Banquet.

Process Example: SSB Membership Example

- Shawn Spengler – Director of Products, NICHE & MRO
- Gary Colello – Director, Customer Logistics Support
- Senetra Burgess – Program Manager, Teleservices

Process Example: Evaluation Decision Matrix

RFI #: RFI NIBID EPA Certified Warewashing Products

Agency Code	Reviewer 1 Score	Reviewer 2 Score	Reviewer 3 Score	Reviewer Score	Total Score NOTE: Re-Sort Descending Order	Average Score	SSB Overall Comments (Verify good comments in individual Reviewer scoring sheets)
NYR	3.8	3.4	3.4	3.4	10.6	3.5	
NCG	3.4	3.2	3.2	3.2	9.8	3.3	
MDB	3.2	2.8	3	3	9	3	

Process Example: Non-select letter example



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703-310-0500
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August 15, 2018

Mr. Joshua Gould
President and Chief Executive Officer
Industries for the Blind, Inc.
920 West Gate City Blvd.
Greensboro, NC 27403

RE: Notice to Unsuccessful Offeror to RFI NIBID- EPA Certified Waxeshining Products

Dear Joshua,

This notice is to inform you that your response to the RFI NIBID- EPA Certified Waxeshining Products was not selected for assignment. Four (4) agencies submitted responses to the RFI and one agency was selected to further develop the opportunity. The selected nonprofit will be published in *NIB This Week* on August 16, 2018.

Based on overall evaluation, the award to the assigned agency has been determined to represent the best value to the AbilityOne Program and the customer.

If you would like to request a debrief regarding your proposal or have any additional questions, please contact me at 703-310-0247 or ajalderon@nib.org to set up a convenient time for us to discuss your proposal.

Regards,

Amanda Alderson
Director, Products, Office and Jan/San



Special Considerations

- NIB may restrict the pool of NPAs when advertising an opportunity:
 - To maximize the significant capital investment
 - Textile and Apparel Group
 - Writing Instruments Group
 - Contract Management Support (CMS) Contract Close-outs
 - Call Center Group
 - Smaller opportunities, more suited for start-ups, may be reserved for small or emerging NPAs
 - Short suspense to meet customer's need: May be reserved for those with current performance