

# National Council on Disability

## Budget Justification

Fiscal Year 2026



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## INTRODUCTION FROM THE CHAIR

The National Council on Disability (NCD) is an independent federal agency that advises the President, Congress, and federal agencies on policy issues affecting people with disabilities. NCD provides analysis, recommendations, and reports to improve the quality of life for all Americans with disabilities and their families. Unlike other federal agencies, NCD's focus is not limited to a specific disability group, age, or topic. Our annual reports and budget justification reflect the breadth of our work across various disability-related issues.

The Council presents this budget justification for FY26, requesting a total budget authority of \$3,850,000 to further our mission to advise the President, Congress, and other federal agencies on a broad array of policies and their impact on people with disabilities.

While people with disabilities face many of the same challenges as their peers without disabilities, these challenges often present unique and compounding barriers.

### **People with disabilities face unique challenges, including:**

- **Housing insecurity:** Limited availability of accessible housing can lead to higher costs and instability.
- **Transportation barriers:** Inadequate and inaccessible transportation options can hinder access to healthcare, employment, and community life.
- **Financial strain:** Rising living costs, combined with lower wages, underemployment, and restrictive income limits for government assistance, can exacerbate poverty and limit financial stability.

In Fiscal Year 2026, the Council will continue to prioritize policy issues identified by the disability community. We will build upon our existing partnerships with federal agencies and lawmakers to advance progress and implement recommended policies. Our budget submission reflects these priorities, reaffirming the Council's role as a strong advocate for people with disabilities within the federal government.

Respectfully,



David Shawn Kennemer

Vice-Chair / Acting Chair

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## **AGENCY OVERVIEW**

### **Agency Mission**

The mission of the National Council on Disability is to be a trusted advisor regarding the impact of federal policies on the lives of people with disabilities to the President, U.S. Congress, and other federal agencies, by reviewing existing policies' effects on the quality of life of people with disabilities; developing policy recommendations; and by engaging policymakers and responding to their requests for assistance accurately, efficiently and without bias.

The National Council on Disability (referred to herein as “NCD” or “the Council”) is an independent, nonpartisan federal agency that provides the Administration and the U.S. Congress with timely analysis and recommendations to advise policy development, revision, implementation, and enforcement efforts as they have impact on the lives of people with disabilities across America. Our purview is not limited to a set policy area or subgroup of disabled Americans, so our advice is not siloed at the exclusion of others' interests. The Council provides advice that thoughtfully considers the diverse needs of our core constituency, which varies greatly by type and severity of disability. NCD's advisement has been critical in preserving and strengthening the impact of the Americans with Disabilities Act (ADA) in our nation's policies and programs.

NCD was first established as an advisory council within the Department of Health, Education, and Welfare in 1978, and then placed within the newly separated Department of Education. The Rehabilitation Act Amendments of 1984 (Public Law 98-221) transformed the National Council on Disability into an independent agency with the mandate to examine statutes, policies, practices, and programs impacting people with disabilities to assess the extent to which they provide incentives or disincentives to community-based services, promote full integration in the community, schools, and in the workplace, and contribute to their independence and dignity, and to advise the President and the Congress on its findings.

Two years later, in 1986, NCD delivered on that charge with a path breaking report, [\*Toward Independence\*](#), which recommended the enactment of a federal disability civil

rights law. NCD later drafted the first version of the Americans with Disabilities Act (the ADA) which was introduced in the House and Senate in 1988. After President George H.W. Bush signed the ADA into law in 1990, NCD's mission was amended to reflect the broad national disability policy goals it enshrined. Since the ADA's enactment, NCD has continued to play a leading role in crafting and impacting disability policy, and advising the President, Congress and other federal agencies on disability policies, programs, and practices.

The Rehabilitation Act Amendments of 1992 and 1998, the Education of the Deaf Act Technical Amendments of 1993, and the Workforce Innovation Opportunity Act (WIOA) of 2014 (Public Law 113-128), also made changes to NCD.

NCD serves a unique role among federal agencies because its mission impacts the daily lives of a broad and diverse population of Americans with disabilities. The duties mandated by NCD's authorizing statute are extensive and belie the Council's limited financial and human resources. In FY24 and FY25, the Council had a \$3.85 million annual appropriation to support the requirements that it -

- Review and evaluate on a continuing basis all policies, programs, practices, and procedures concerning individuals with disabilities conducted or assisted by federal departments and agencies and all statutes and regulations pertaining to federal programs which assist such individuals with disabilities in order to assess their effectiveness in meeting the needs of individuals with disabilities;
- Gather information about the implementation, effectiveness, and impact of the Americans with Disabilities Act of 1990;
- Make recommendations to the President, the Congress, and other officials of Federal agencies or other Federal entities;
- Provide Congress on a continuing basis, advice, recommendations, legislative proposals, and any additional information that NCD or the Congress deems

appropriate; and,

- Review and evaluate on a continuing basis new and emerging disability policy issues affecting individuals with disabilities at the Federal, State, and local levels, and in the private sector, including the need for and coordination of adult services, access to personal assistance services, school reform efforts and the impact of such efforts on individuals with disabilities, access to health care, and policies that operate as disincentives for the individuals to seek and retain employment. (29 USC 781).

## **COUNCIL STRUCTURE**

The governing body of the Council is comprised of nine members (five presidential and four congressional appointees), including a Chair, whom the President designates; and a Vice-Chair, appointed by the Chair. Congressional appointees are appointed by each of the following: the Speaker of the House, the House Minority Leader, the Senate Majority Leader, and the Senate Minority Leader. Each council member may serve a three-year term, with the possibility of a second term. Council members serve until a replacement appointment occurs; therefore, terms can extend beyond six years.

Council members are special government employees (SGE) who live across the country and serve in a part-time capacity. Each appointee brings a unique perspective informed by varied personal and professional experiences. Council members are people with disabilities, disability service providers, parents or family members of people with disabilities, or other people who have substantial knowledge of or experience with disability policies and programs. Council members are appointed to represent people with disabilities, national organizations concerned with disabilities, providers and administrators of services to people with disabilities, people engaged in conducting medical or scientific research related to disabilities, business concerns and labor organizations. By statute, the majority of the members of the Council are to be people with disabilities and are to be broadly representative of minority and other individuals and groups. Currently, 100 percent of the current council members are people with disabilities. Eighty percent of full-time staff are people with disabilities.

Every year, the Council proposes and advances new policy projects based upon current events, national trends, respective areas of expertise, suggestions from policymakers, and anticipated legislative reauthorizations or regulatory activities. The Council members deliberate and ultimately vote on upcoming priorities. In response to the vote, and in consideration of the Council's budget, statements of work are developed to undertake the research approved by the Council members.

To fulfill the mission of the agency, the Chair appoints members to advise on commissioned policy priorities within a subcommittee structure. These subcommittees are

comprised of no more than four council members and a full-time professional staff member who manages the work of the project, drafts portions of policy advice based upon Council members' discussions and research, and who acts as a Contract Officer Representative (COR), or Agreements Coordinator, for any supplemental data provided to a project from a contracted researcher. Once each policy project yields a final draft product, it is shared with the entire Council for review, discussion, refinement, and ultimately, a vote of approval by Council members. Once approved, staff work with a professional editor on final edits and report layout before dissemination of the final report, including its policy recommendations to the President, Congress, other federal agencies and all interested parties.

When opportunities or circumstances warrant immediate response to proposed legislation or regulations, including when the Council is requested directly by policymakers for such input, the Council provides responses based upon the Council's existing body of research and recommendations to ensure the needs of people with disabilities are discussed and included in new legislation and policies.

The Councils' vote is required to approve the annual budget and spending plan as well as all published research, papers, and formal opinions published in the name of the Council members, except that the requirement of a vote for changes to the budget may be suspended consistent with the powers of the Executive Committee specified in NCD's bylaws. Professional staff provide a status of funds and updates on policy projects to the Executive Committee approximately monthly. The Council is provided with updates no less than once per quarter as part of the quarterly business meetings of the Council.

In addition to projects that the Council members vote to commence, and the work of the professional staff to move those forward during the budget cycle, NCD continues to brief and advise on past work and meet with policymakers to ensure that NCD's recommendations are known and understood.

NCD is respected as an expert resource within the Federal Government and beyond on all disability policy issues.



## **ORGANIZATIONAL STRUCTURE**

The bylaws of the Council delegate the power, authority, and responsibility to the executive director to supervise and direct the day-to-day business and management of the Council, including decision-making processes and allocation of staff resources to assist presidentially and congressionally appointed members in fulfilling their duty to advise on policy priorities that will improve the lives of all Americans with disabilities.

A small, dedicated full-time staff supports the work of the Council members, with its physical office located in Washington, DC. The executive director is responsible for hiring technical and professional employees to assist the Council in carrying out its duties and is accountable for the assignment of staff duties. (See Appendix C, Organizational Chart).

The duties of the professional staff include:

- Analyzing federal laws, regulations, programs, policies, and case law precedent; and proposing and developing policy positions that have a national, state, local, and international impact on the lives of people with disabilities;
- Researching and drafting policy briefs and reports for policymakers with the input and oversight of the Council; as well as providing requested technical assistance on bill drafting and review and constituent concerns as requested;
- Monitoring congressional activity on issues critical to the disability community and cultivating and maintaining effective working relationships with stakeholders at the federal, state, and local levels; and
- Providing critical staff support and monitoring the Council's finance and accounting, information technology, and human resources management.

## **PERFORMANCE**

### **STRATEGIC FRAMEWORK, FY22 – FY26**

The Council's budget submission is submitted for the last year of NCD's five-year strategic plan. The plan seeks to reflect goals and objectives approved by the Office of Management and Budget and prioritized by the Council's constituency to focus on the most pressing needs of the disability community in furtherance of the goals of the Americans with Disabilities Act; optimize operational efficiency and accountability; and pursue mission-critical activities consistent with the Administration's priorities and directives.

The Council evaluates its progress towards fulfillment of its goals and objectives by conducting program evaluations prior to implementation – formative needs evaluation, periodically and ad hoc; formative process evaluation; and at the end of each, summative outcome and impact evaluation.

### **OBJECTIVES, STRATEGIC RESULTS AND PLANNED ACTIVITIES**

NCD has a unique mission among federal agencies as it is charged with reviewing all programs and policies across the Federal Government, not merely one aspect of policy affecting people across all types of disabilities or all policy areas affecting only one subpopulation of people with disabilities. With that unique and far-reaching mission in mind, the Council's strategic goals for FY 2022 – 2026 include the following:

- Goal 1 – Develop new disability policy recommendations with a particular emphasis on issues of health disparities, bioethics, employment and independent living.
- Goal 2 – Review and analyze both proposed and existing federal policies' impact on people with disabilities.
- Goal 3 – Engage policymakers of both the Administration and Congress and respond to their requests for assistance accurately and efficiently.
- Goal 4 – Gather information from subject matter experts and members of the disability community both of Washington, DC, and nationally, to help inform

policymakers' work.

- Goal 5 – Enhance agency operational and programmatic internal controls to effectively service execution of statutory duties.
- Goal 6 – Recruit, retain, and develop a highly qualified professional staff to effectively service execution of statutory duties.

<p style="text-align: center;"><b>GOAL 1</b> <b>OBJECTIVES, STRATEGIC RESULTS AND PLANNED ACTIVITIES</b></p>
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**GOAL 1: Develop new disability policy recommendations with a particular emphasis on issues of healthcare disparities, disabled youth residing in nursing facilities (Olmstead), accessible ground transportation, autonomous vehicle technology, employment, and people with disabilities from tribal lands.**

1. Develop recommendations that help foster quality healthcare and accessibility for people with disabilities in a manner consistent with self-determination through a series of legislative proposals or a combination of executive, administrative, or legislative action.
2. Develop recommendations to address the barriers to full integration for people with mobility disabilities caused by inaccessible ground transportation and public rights-of-way.
3. Develop recommendations on the appropriate tax classification for people with disabilities who work in sheltered workshops consistent with current disability laws.
4. Develop recommendations on autonomous vehicle technology and accessibility for people with disabilities.
5. Develop recommendations on youth residing in nursing facilities in relation to the ADA's integration mandate and the Supreme Court's decision in *Olmstead v. L.C.*
6. Develop recommendations to address the concerns and issues unique to people with disabilities on Tribal lands.
7. Develop recommendations on including people with disabilities in clinical trials.
8. Develop recommendations on disability data collection.

9. Advise on and promote recommendations to address barriers created by federal income and asset limitations imposed on people with disabilities.
10. Advise on and promote recommendations on the ethical advancement of fetal medicine and genetic technology.

**In furtherance of Goal 1, the Council accomplished the following in FY24:**

- Updated and amended NCD's [Framework to End Health Disparities of People with Disabilities](#) (Framework) and continued to brief on the Framework with a variety of stakeholders and agencies, including the Joint Commission on Hospital Accreditation; the Health Resources and Services Administration; Centers for Medicare and Medicaid Services; and the Association of American Medical Colleges, the Stanford Medicine Alliance for Disability Inclusion, the Danish Embassy at their request, as well as other stakeholders.
- Released the report "[From Fetal Surgery to Gene Editing: The Current and Potential Impact of Prenatal Interventions on People with Disabilities.](#)" the latest installment in our bioethics series, and briefed OMB and White House policy staff on the report.
- Released the NCD 2023 Progress Report: "[Income and Assets Limitations Imposed by the Federal Government on People with Disabilities: A Way Forward](#)" and held a panel briefing in concert with NCD's fall quarterly Council meeting to discuss it in detail.
- Created and released an "[Analysis of HEADs Up Act to Support Cost Estimates,](#)" which estimates the amount of people with Intellectual and Developmental Disabilities (I/DD) who could require specialized medical and dental care under the Healthcare Extension and Accessibility for Developmentally Disabled and Underserved Population (HEADs UP) Act (HR 3380), which NCD helped draft and of which NCD recommends passage.
- Researched, drafted, and released a report on the absence of people with disabilities in clinical trials: "[The Implicit and Explicit Exclusion of People with Disabilities in Clinical Trials.](#)"
- NCD met with representatives from the Intertribal Disability Advocacy Council

(IDAC) to discuss IDAC's work on tribal lands and disability, and also participated in a National Indian Council on Aging (NICOA) Technical Assistance and Resource Center (TARC) Advisory Council Meeting to help inform NCD's report on the experience of people with disabilities on tribal lands.

- NCD conducted focus groups and interviews to assess the effectiveness of the implementation and recommendations from NCD's 2003 report, *People with Disabilities on Tribal Lands: Education, Healthcare, Vocational Rehabilitation, and Independent Living*.
- Continued developing a report on the denial of employment benefits resulting from the misclassification of people with disabilities who work in sheltered employment as rehabilitation clients or independent contractors for federal employment tax purposes.
- Provided [extensive comments and recommendations](#) to the Department of Justice Civil Rights Division on the NPRM, "Nondiscrimination on the Basis of Disability; Accessibility of Medical Diagnostic Equipment of State and Local Government Entities."
- Presented on [NCD's Framework to End Health Disparities for People with Disabilities](#) in March 2024 at a conference of the Accreditation Council on Graduate Medical Education, where attendees included the leaders of residency programs from across the U.S.; and in May 2024 at a Stanford Medical [conference](#) on disability, with over 1,000 registrants from over 60 countries.
- Submitted [detailed comments](#) to the HHS Office for Civil Rights (OCR) on its proposed rule updating HHS' Section 504 regulation which prohibits disability discrimination by recipients of federal funding. Three of the new topics come directly from [NCD's Bioethics Series \(2019\)](#) and from [NCD's Rocking the Cradle report \(2012\)](#) on discrimination against parents with disabilities. NCD worked closely with OCR in an advisory role during the development of the proposed rule for the past several years.
- [Advised the Census Bureau](#) against making proposed changes to the disability questions in American Community Survey. NCD met with the Director of the Census Bureau regarding NCD's concerns about the impact of proposed changes which would have diminished the estimated population of people with disabilities by 40 percent. NCD also

hosted a panel of Census Bureau representatives at the fall NCD quarterly meeting who discussed the proposed changes to the disability questions in the ACS. Following weekly planning meetings with the Census Bureau, OMB, and stakeholder organizations, NCD co-sponsored a stakeholder convening on disability questions in the ACS.

- Participated as a co-lead on the White House's Disability Data Interagency Working Group for the Evidence Agenda Community Engagement workstream.
- Researched and began drafting a report on the status of ground transportation for people with mobility disabilities. To this end, NCD hosted panels on affordable, accessible housing and barriers and solutions to ground transportation for people with mobility disabilities at the November 2023 NCD quarterly meeting in Providence, Rhode Island. Panelists included a State Senator; staff of the Boston and Vermont Centers for Independent Living; a nonprofit real estate development organization; a disability transportation advocate, and a community organizer for transportation access. At its February 2024 quarterly meeting, NCD also hosted a panel of federal agency representatives from the Department of Transportation, the Department of Justice, and the Access Board who discussed policy progress and ADA enforcement on ground transportation and public rights of way. NCD conducted over twenty interviews in the development of the report with staff of federal enforcement agencies; disability organizations; private transportation providers; scholars; individuals with disabilities; transportation advocates; AV manufacturers; and AV technology developers, and provided three opportunities for public comment in November 2023, and February and May 2024 to inform its report.

**In FY25, NCD is prioritizing work in the following areas of focus:**

- Develop analysis of research and available data on trends regarding youth in nursing homes.
- Advise and brief policymakers on the status of accessible ground transportation for people with mobility disabilities, particularly wheelchair users, including developments in autonomous vehicles (AV) and AV technology.
- Advise and brief policymakers on NCD's report and recommendations on absence of and need to include people with disabilities in clinical trials.

- Continue to advise and brief policymakers on how best to address the health disparities of people with disabilities.
- Continue to advise and brief policymakers on the barriers that result from imposing income and asset limitations on people with disabilities for federal programs and benefits eligibility.
- Advise and brief policymakers on the implications of fetal medicine and genetic editing technology for people with disabilities.
- Advise and brief policymakers on employment related tax issues and how they impact people with disabilities, such as the denial or ineligibility to receive employment benefits because of misclassifying people with disabilities as rehabilitation clients or independent contractors for federal employment tax purposes.

<p style="text-align: center;"><b>GOAL 2</b>  <b>OBJECTIVES, STRATEGIC RESULTS and PLANNED ACTIVITIES</b></p>
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**GOAL 2: Provide perspectives and analysis on existing federal policies' impact on people with disabilities.**

1. Continue to liaise with FEMA regarding NCD's recommendations on disaster and emergency relief planning and responses with respect to the rights of people with disabilities.
2. Provide recommendations concerning how to address healthcare disparities of people with disabilities.
3. Provide analysis and recommendations concerning economic opportunities for people with disabilities.
4. Provide recommendations concerning disability civil rights enforcement.

In addition to the projects that the Council approved for research and release in FY25, the Council continues to meet with policymakers regarding its existing reports and position

letters that address proposed and existing legislation. For example, in FY24, NCD continued to discuss core elements of its FY22 [Framework to End Health Disparities of People with Disabilities](#) with congressional committees of jurisdiction and individual congressional offices interested in pursuing legislation addressing items in the framework. NCD also served on a White House interagency committee looking at economic resilience in Puerto Rico and assisted other federal agencies on how the disability community is impacted, drawing heavily from our 2022 report, [Disparate Treatment of Puerto Rico Residents with Disabilities in Federal Programs and Benefits](#).

As another example, as Congress has continued to pursue the goal of lowering prescription drug prices, NCD has continually alerted policymakers of the issues raised in [NCD's 2019](#) and [2022 reports](#) related to that topic. Additionally, we provide technical advice and recommendations to our federal colleagues on disability-related regulatory proposals that impact people with disabilities when they arise; and with congressional staff on general legislative proposals that impact people with disabilities, as well as disability-specific legislation that is introduced.

**In furtherance of Goal 2, the Council accomplished the following in FY24:**

- Amended and updated the recommendations in [NCD's Framework to End Health Disparities for People with Disabilities](#), and continued to engage discussions regarding advancing the Framework with the Administration and Congress, including recommendations on a Special Medically Underserved Population (SMUP) designation; disability competency training of medical professionals; improved data collection; accessible medical equipment; and incentives for healthcare providers to treat patients with disabilities; and ethics in fetal medicine and germline editing. NCD also continued to communicate with non-governmental organizations (NGOs) that are positioned to have impact on these issues, e.g., the Association of American Medical Colleges, the Association of Graduate Medical Education, and the Joint Commission on Hospital Accreditation.
- Met with advocates, Congress, and other federal agencies to receive feedback and discuss potential next steps concerning the [HEADs UP Act, H.R. 3380](#), a bill NCD helped draft that would designate people with IDD as a “Special Medically Underserved Population” (SMUP) under the Public Health Service Act.



- Met with senior analysts at MACPAC (Medicaid and CHIP Payment and Access Commission), a legislative branch support agency that advises Congress on Medicaid and CHIP policy, to discuss NCD's work on state covered oral health services that are specific to treating those with IDD as well as the policies that may improve access to care.
- In July 2024, presented at a Capitol Hill roundtable discussion on the matter of SMUP designation, organized by NGOs.
- Presented on [NCD's Framework to End Health Disparities for People with Disabilities](#) in March 2024 at a conference of the Accreditation Council on Graduate Medical Education, where attendees included the leaders of residency programs from across the U.S.; and in May 2024 at a [conference](#) of a Stanford Medical disability group , with over 1,000 registrants from over 60 countries.
- Participated in National Institute of Health (NIH)'s monthly meetings on the development of accessible home diagnostic tests for consumers with limited vision or blindness, and those with limited or no dexterity.
- Provided technical assistance and suggestions for improvement on proposed bill language to several congressional offices contemplating pursuit of legislation that seeks to remove healthcare barriers for people with disabilities.
- Met with CMS to recommend that disability clinical care and competency training of medical staff; data collection; ASL interpretation; and accessible medical and diagnostic equipment be included as a Medicaid Conditions of Participation in an anticipated CMS' proposed rule. NCD provided recommended Conditions of Participation in written form, along with an analysis of the precedent for their inclusion.
- Provided the Department of Justice with feedback during the interagency review process on the final rule, "Nondiscrimination on the Basis of Disability; Accessibility of Web Information and Services of State and Local Government Entities."
- Provided [extensive comments](#) and recommendations to the Department of Justice Civil Rights Division on the NPRM, "Nondiscrimination on the Basis of Disability; Accessibility of Medical Diagnostic Equipment of State and Local Government Entities."
- Submitted detailed comments to the HHS Office for Civil Rights (OCR) on its proposed rule updating HHS' Section 504 regulation which prohibits disability discrimination by recipients of federal funding. Three of the new topics come directly from and heavily reference [NCD's Bioethics Series \(2019\)](#) and from [NCD's Rocking the Cradle report](#)

[\(2012\)](#) on discrimination against parents with disabilities. NCD worked closely with OCR in an advisory role during the development of the proposed rule for the past several years.

- Developed and released a policy brief titled [“Cummings v. Premier Rehab Keller PLLC: Implications and Avenues for Reform.”](#) which analyzes the holding and implications of the U.S. Supreme Court decision in *Cummings v. Premier Rehab Keller P.L.L.C.* which eliminated the ability of people who experience disability-based intentional discrimination to obtain emotional distress damages from entities who receive federal financial assistance, under Section 504 of the Rehabilitation Act of 1973 or Section 1557 of the Patient Protection and Affordable Care Act.
- Released the [Strengthening the HCBS Ecosystem report](#) that examined the state of the nation’s HCBS in place prior to and during the pandemic that contributed to the inability of residents with I/DD to transition to lesser-density community housing options.
- [Continued to advise](#) the Joint Commission (on hospital accreditation) concerning disability competency training of medical professionals and provided them with related recommendations concerning ending health disparities of people with disabilities.
- Served on HHS’ National Advisory Committee on Individuals with Disabilities and Disasters (NACIDD) to advise the Secretary of Health and Human Services on actions HHS can take before, during, and after disasters and emergencies to meet the unique needs of individuals with disabilities.
- Continued participating in National Institute of Health (NIH)’s monthly meetings on NIH’s development of accessible home diagnostic tests for consumers with limited vision or blindness and those with limited or no dexterity.
- Continued communicating with the SBA Administrator regarding an NCD [advisory letter](#) regarding the addition of people with disabilities to the 8(a) Business Development Program presumed group list.
- Advised CMS on a new tool being developed with the Office of Minority Health to update its National Culturally and Linguistically Appropriate Services Standards toolkit.
- Advised GAO, at GAO’s request, on the issue of disability clinical care and competency training to inform report [GAO-24-10689, “People with Disabilities: Information on the Health Care Workforce and Provider Training.”](#)
- Served on the interagency Coordinating Council on Access and Mobility (CCAM).

- Participated in Amtrak quarterly meetings regarding its efforts to make Amtrak stations accessible nationwide, advising on improving the accessibility of Amtrak’s reservation application (app), communication for customers who are deaf or hard of hearing, or blind, and the physical accessibility of stations, boarding, and the interior of Amtrak’s new Acela train set.
- Participated in meetings of the Puerto Rico IPC - a cabinet level task force that reports directly to the President that focuses on providing Puerto Rico with the resources and technical assistance it needs to recover and prosper. NCD’s provides technical assistance to help ensure actions announced at the 2022 Economic Dialogue are implemented in a way that is inclusive of and accessible to people with disabilities.
- Participated in meetings of the National Advisory Council on Individuals with Disabilities and Disasters (NACIDD), which provides findings, advice, and recommendations to the Secretary of HHS on actions HHS can take before, during, and after disasters and emergencies to meet the unique needs of individuals with disabilities.
- Participated in FEMA’s disability integration stakeholder workgroups, hosted by the Director of FEMA’s Office of Disability Integration and Coordination.
- Participated in monthly Olmstead Interagency Coordination Meetings, hosted by HHS’ Office of Civil Rights and DOJ’s Civil Rights Division, where participating federal agencies share news and updates on federal policy and enforcement of the ADA’s integration mandate and the Supreme Court’s decision in Olmstead v. L.C.
- Participated in meetings of the Presidents Committee on People with Intellectual Disabilities.
- Met with leadership of Source America and National Industries for the Blind, Central Nonprofit Agencies (CNA’s) under the AbilityOne program, to discuss the tax classification of workers with disabilities employed through the AbilityOne program related to employment benefits and protections.
- Submitted a statement to the White House Office of Information and Regulatory Affairs (OIRA) regarding the AbilityOne Commission on the Final Rule, “Supporting Competition in the AbilityOne Program.”

- Sent an [advisory letter](#) to Congress opposing any legislative efforts in the FY24 National Defense Authorization Act (NDAA) process that could increase the AbilityOne program's congressionally mandated contract set-aside goal.
- Met with leadership from National Industries for the Blind (NIB) and later leadership from SourceAmerica, AbilityOne Central Nonprofit Agencies, to discuss the future of employment for people who are blind under the AbilityOne program.
- Met with the AbilityOne Commission in order to gather information about newly implemented policies in order to bring current NCD's 2020 report, [Policies from the Past in a Modern Era: The Unintended Consequences of the AbilityOne Program and Section 14\(c\)](#). NCD is analyzing new data generated by AbilityOne and the policy changes made to the AbilityOne program to determine the program's ongoing impact on employment for people who are blind or have significant disabilities.
- Continued to engage with the two Central Nonprofit Agencies (CNAs) in the AbilityOne Program – SourceAmerica and National Industries for the Blind to discuss to discuss new data and policy changes under the AbilityOne program and its impact on their CNA roles.
- Met with the Alliance for Expanding America's Workforce, a network of Non-profit Agencies (NPA) that receive federal contracts through the AbilityOne Program to discuss their perspectives on the recent policy changes implemented by the AbilityOne Commission and their impact on expanding employment opportunities for people with disabilities.
- Assisted the Internal Revenue Service in identifying taxpayers with disabilities to test the accessibility of its new web application system called Direct File, a program that provides free federal tax return filing, step-by-step guidance to assist people in filing their taxes independently, and real-time online support from IRS customer service representatives. The goal of the new IRS system is to help to ensure that employees earning low to moderate income are taking advantage of the IRS's antipoverty programs like the Earned Income Tax Credit and the Child Tax Credit.

**In Fiscal Year 2025, NCD is prioritizing work in the following areas of focus:**

- Continue to advise and brief policymakers, non-governmental medical organizations, and

others on topics addressed by NCD's [Framework to End Health Disparities of People with Disabilities](#).

- Advise and brief policymakers on the current state of accessible ground transportation for people with mobility disabilities, particularly wheelchair users, including the development of autonomous vehicles (AV) and AV technologies.
- Advise and brief policymakers on youth that are residing in nursing facilities in relation to the ADA's integration mandate and the Supreme Court's decision in *Olmstead v. L.C.*
- Advise and brief policymakers on the need for people with disabilities in clinical trials.
- Advise policymakers on the barriers that result from income and asset limitations imposed on people with disabilities for federal programs and benefits eligibility.
- Advise policymakers on NCD's report on fetal medicine and genetic technology and the implications for people with disabilities.

<p style="text-align: center;"><b>GOAL 3</b> <b>OBJECTIVES, STRATEGIC RESULTS and PLANNED ACTIVITIES</b></p>
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**GOAL 3: Engage policymakers of both the Administration and Congress and respond to their requests for assistance accurately and efficiently.**

1. Provide timely disability policy briefings for members of the Administration and Hill staff.
2. Provide timely written briefing materials to congressional leadership and members of the Administration on policy priorities of the disability community.
3. Increase the time NCD staff and appointed Council members dedicate to direct engagement of congressional and Administration policymakers with NCD's policy advice.

In FY24, NCD responded to congressional requests for policy assistance; met with and offered briefings to congressional and committee offices regarding our newly released policy research; engaged with congressional offices and agency leadership regarding their own priority areas that have implications for Americans with disabilities; and engaged media on topics on which we have completed research and advised policymakers.

**In furtherance of Goal 3, the Council accomplished the following in FY24:**

- Regularly met with House and Senate committee staff and leadership staff on a bipartisan basis to discuss how NCD's recommendations can assist in their policy objectives to improve outcomes for people with disabilities.
- Provided technical assistance to the Senate Health, Education, Labor, and Pensions (HELP) Committee related to the Prescription Drug Price Relief Act to ensure that policies pursued to lower drug prices do not negatively impact people with disabilities or limit their access to medications. The HELP Committee sought NCD's assistance with bill text to ensure that its analysis to determine "excessive" drug prices is consistent with NCD's [2019](#) report cautioning policymakers against relying on QALY's and NCD's [2022](#) report recommending that policymakers examine alternatives to QALY-Based Cost-Effectiveness Analysis.
- Provided technical assistance to the Senate Small Business Committee staff in support of the Supporting Disabled Entrepreneurs Act (S. 3528) which would direct the Small Business Administration (SBA) to designate a point of contact for disabled entrepreneurs with the responsibility of gathering data on disabled entrepreneurs participating in SBA programs. This bill intends to increase SBA's understanding about the needs of people with disabilities. Committee staff asked NCD to assist with the qualifications for the position that this bill would create. NCD reviewed S. 3528 and determined that it is consistent with prior NCD reports' findings and recommendations.
- Continued to assist the lead sponsor of the Healthcare Extension and Accessibility for Developmentally disabled and Underserved Population Act (HEADS Up Act) (HR 3380). The HEADS Up Act is consistent with recommendations from [NCD's Neglected for Too Long: Dental Care for People with Intellectual and Developmental Disabilities \(2017\)](#) report and would direct the Health Resources and Services Administration (HRSA) to designate people with Intellectual and Developmental Disabilities (I/DD) as a Special Medically Underserved Population (MUP).
- Held a closed briefing with the House and Senate Armed Services Committee staff along with Defense and Military Legislative Assistants to discuss NCD's 2020 report, [Policies from the Past in a Modern Era: The Unintended Consequences of the AbilityOne Program in a Modern Era](#), to help explain NCD's findings regarding the

AbilityOne program. HASC has jurisdiction over the National Defense Authorization Act, which currently has a 0.7% goal set aside for AbilityOne contracts. This followed NCD's April 1<sup>st</sup> letter to House and Senate Armed Services Committees affirming NCD's continued [caution](#) regarding any legislative efforts to increase the Department of Defense's contract set-aside goal for the AbilityOne program.

- Provided technical assistance to the House Small Business Committee staff in drafting the Think DIFFERENTLY About Disability Employment Act ([H.R. 7989](#)), which seeks to expand jobs opportunities within the Small Business Administration (SBA). H.R. 7989 would require SBA to consult with the National Council on Disability (NCD) on how to expand entrepreneurship or self-employment opportunities as well as increase jobs within small business concerns for people with disabilities. Congressional staff informed NCD that their intent of H.R. 7989 is to further NCD's past recommendations to SBA. H.R. 7989 passed the House and is now before the Senate.
- The House Energy and Commerce Committee advanced the Charlotte Woodward Organ Transplant Discrimination Prevention Act ([H.R. 1520](#)), consistent with recommendations from NCD's 2019 report, [Organ Transplant Discrimination Against People with Disabilities](#), which found that people with disabilities, especially intellectual disabilities experience a lack of access to donated organs due to subjective judgements about the value of a life with a disability, assumptions about their quality of life, and misconceptions about their ability to comply with post-operative care. H.R. 1520 would prohibit health care providers and organ transplant centers from denying or restricting a qualified individual's access to organ transplants based solely on the individual's disability.
- Held a closed briefing with the House Oversight and Government Accountability Committee staff to discuss NCD's 2020 report, [Policies from the Past in a Modern Era: The Unintended Consequences of the AbilityOne Program in a Modern Era](#). The Oversight Committee has jurisdiction over the AbilityOne Program and requested a briefing to discuss NCD's findings regarding the program.
- Submitted NCD's [Statement for the Record](#) to the U.S. House Committee on Education and the Workforce, Subcommittee on Early Childhood, Elementary, and Secondary Education's hearing, "Proven Results: Highlighting the Benefits of Charter Schools for Students and Families." NCD's statement highlighted the educational barriers that

students with disabilities experience in charter schools and advised the Committee to examine successful charter school models highlighted in NCD's 2018 report, [Charter Schools—Implications for Students with Disabilities](#).

- Submitted NCD's [Statement for the Record](#) to the U.S. Senate Special Committee on Aging in support of its hearing, "All Means All: Empowering People with Disabilities to Thrive in Careers and the Workplace." NCD's statement highlighted the disharmony between the definition of competitive integrated employment (CIE) and the AbilityOne Program and affirmed NCD's support for the passage of the Transformation to Competitive Integrated Employment Act (S. 533 in the 118th) and were based on NCD's 2020 report, [Policies from the Past in a Modern Era: The Unintended Consequences of the AbilityOne Program in a Modern Era](#) and NCD's 2019 report, [A Cursory Look at the AbilityOne Program](#).
- The House passed the Protecting Health Care for All Patients Act ([H.R. 485](#) in the 118th) consistent with NCD's 2019 report, [Quality-Adjusted Life Years and the Devaluation of Life with a Disability](#), which found that the use of the QALY in standard cost-effectiveness analysis has a discriminatory design and impact that undervalues prescription drugs that extend the lives of people with disabilities, and has the potential to result in restricted insurance coverage. H.R. 485 would prohibit the use of the QALY and other similar metrics in all federal programs. The bill is currently before the Senate.
- The [Committee Report](#) accompanying the Department of Labor, Health and Human Services, and Education and Related Agencies Appropriations Act, 2025 (H.R. 9029) advanced recommendations from the National Council on Disability's 2019 report, [The Danger of Assisted Suicide Laws](#), which cautioned policymakers that assisted suicide laws could disproportionately impact the lives of people with disabilities. The report encourages Health and Human Services' Office of Civil Rights (OCR) to clarify that suicide prevention grants and services must comply with existing disability rights laws and well as clarify that sections 504 and 508 of the Rehabilitation Act require physicians to provide people with disabilities with information on the full array of available clinical treatments and available long-term services and supports and to require that referrals to such treatments and services be given if requested.



**Media engagement** – NCD’s work is routinely highlighted in national media and industry publications, and NCD regularly receives media inquiries for comment and information on current policies and events related to people with disabilities and to our most recent report releases. A small sampling of media mentions in Fiscal Year 2024 include the following:

- MSN.com [article](#) mentioned and linked to NCD’s Health Disparities Framework calling “for comprehensive disability care education in all U.S. medical, nursing and health professional schools.”
- POLITICO posted [in memoriam](#) to NCD’s late Chairman, citing he “created a policy framework for doing away with health disparities.”
- [Forbes](#) referenced a NCD report regarding public buses in its “ADA at 34” article.
- Disability Scoop covered DOL’s comprehensive review of the Section 14(c) subminimum wages, [referencing NCD](#) among other agencies.
- Johns Hopkins University [HUB newsletter](#) with Bonnielin Swenor, founder and director of the Johns Hopkins Disability Health Research Center, mentioned NCD outlining the need for designating a health disparity population.
- Disability Scoop mentioned NCD’s 2019 [bioethics series report](#) on Quality Adjusted Life Years (QALYs) report.
- Women’s eNews [article](#) also referenced NCD’s QALYs report.
- Associated Press [article](#) on Kansas expanding an income tax credit for goods and services purchased from companies and nonprofits employing disabled workers included a quote from an NCD Council Member.
- Chicago Tribune referenced NCD’s 2019 report on Dangers of Assisted Suicide in an [article](#) on Illinois’ medical aid in dying legislation.
- Newsweek [op-ed](#) also referenced and links to NCD’s 2019 report.
- Star Tribune [article](#) referenced NCD in comparing Minnesota and Canada laws on assisted suicide.
- Scioto Post article mentioned NCD in an [article](#) on U.S. Reps. Wenstrup and Correa reintroducing a resolution opposing physician-assisted suicide.
- Yahoo Finance referenced NCD in an article on the [SSI marriage penalty](#).
- Disability Scoop covered NCD’s report on [asset limits](#).
- Axios short article on [health providers](#) mentioned NCD: “Flashback: The National Council

on Disability, an independent federal agency, in a [2022 report](#) called for comprehensive disability care education in all U.S. medical, nursing and health professional schools.”

- Mother Jones referenced NCD’s Guardianship report in an [article](#) on Arizona voting rights.
- Bloomberg Law [article](#) on an HHS final rule for Section 504 referenced NCD: “In the initial proposal of the rule last year, the HHS said the Covid-19 public health emergency was illustrative of the potential harms of discrimination. It cited National Council on Disability findings that discrimination by medical practitioners resulted in people with chronic illness and other afflictions being denied resources.”

**In FY25, NCD is prioritizing work in the following areas of focus:**

- NCD will continue to provide briefings on its [Framework to End Health Disparities of People with Disabilities](#) for congressional staff in committees of jurisdiction, individual congressional offices indicating interest, and federal agencies with responsibility over areas identified in the framework.
- NCD will provide policy briefings to congressional, committee, and leadership staff as well as colleagues and leadership across the administration on recent report releases and those slated for release in FY25, including reports on accessible ground transportation for people with mobility disabilities; the absence of and need to include people with disabilities in clinical trials; fetal medicine and germline editing; the negative impacts of federal income and asset limitations imposed on people with disabilities; and on the negative impacts of misclassification of employees with disabilities by community service providers / sheltered workshops.
- NCD will continue responding to requests for specific subject matter briefings and technical assistance and research for bill text development, convening stakeholders, and responding to constituent inquiries from individual, committee, and leadership offices as well as from colleagues from within the administration.

<p style="text-align: center;"><b>GOAL 4</b> <b>OBJECTIVES, STRATEGIC RESULTS and PLANNED ACTIVITIES</b></p>
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**GOAL 4: Gather information from subject matter experts and members of the disability community both of Washington, DC, and nationally, to help inform policymakers' work.**

1. Engage the disability community beyond Washington, DC and solicit their views regarding timely policy matters including but not limited to issues of healthcare disparities and employment.
2. Deliberate and purposeful outreach to disability communities in United States' territories and tribal lands.
3. Deliberate and purposeful outreach to the community of disabled veterans.
4. Provide opportunities for the disability community to provide input to policymakers on disabilities issues prior to policy decision-making.
5. Develop information gathering partnerships to generate effective intelligence for policymakers to use in weighing issues.

In FY24, in service of its policy development cycle, NCD staff and Council members continued outreach efforts to national organizations, individual constituents, academics, disability coalitions; and disability conferences, all of which informed the research projects as well as helped steer the direction of policy priorities the Council set for the next fiscal year. For each one of our reports released throughout FY24, our research involved engagement of people with disabilities from across the country in the form of focus groups, opportunities for public comment, interviews, and advisory councils. In each report, we highlighted and summarized those interactions to elevate first-hand experiences of people with disabilities to the attention of policymakers.

In FY24, NCD entered into cooperative agreements and contracts with subject matter experts to assist with our research endeavors and help ensure that the information provided to policymakers is current, relevant, and accurate. These agreements are with organizations, academic institutions, research groups, and individuals that have specialized expertise in certain policy areas to supplement the expertise of our

professional staff and Council Members.

**In furtherance of Goal 4, the Council accomplished the following in FY24:**

**Meetings and Delegations:**

- Met with staff and leadership of numerous disability nonprofits in FY24 to discuss their organizational policy priorities and ensure that their constituencies' concerns are considered and reflected in the work of the Council.
- Attended numerous national disability organizations' annual policy conferences to stay aware of organizational priorities and interact directly with stakeholders.
- Held individual meetings with numerous other national disability advocacy leaders to learn about their policy priorities for 2024 and identify topics for potential policy projects for NCD in FY25.
- Presented NCD's 2024 policy projects to the Task Force Co-Chairs of the Consortium for Citizens with Disabilities (CCD), the largest coalition of national organizations that advocate on federal public policy for people with disabilities and requested their feedback and concerns in order to refine NCD's ongoing research.
- Met with the Director of the Division of Human Development and Disabilities and staff at the annual Association of University Centers on Disability (AUCD) conference to discuss CDC's current priorities regarding disability.
- Met with leadership of ANCOR regarding its concerns about two proposed rules that would negatively impact the ability of people with disabilities to transition to community living.
- Assisted the Internal Revenue Service's (IRS) National Taxpayer Advocate by providing suggestions for questions to include in a national questionnaire of sheltered workshops and how they classify their workers. This national questionnaire intends to gather data on the extent of the intentional or unintentional misclassification of workers with disabilities as "nonemployees" for federal employment tax purposes and could leave workers ineligible for many employment protections and benefits.
- Participated in several international events. Delegations with representatives from Germany, Jordan, Morocco, Iraq, Algeria, Egypt, and the United Arab Emirates visited the NCD offices to learn more about NCD's structure and history as well as

about U.S. disability policy. NCD's Chair was a part of the Presidential Delegation to Paris, France for the Opening Ceremony and events of the Paralympics. NCD also participated in a roundtable at the Danish embassy focusing on health disparities of people with disabilities.

### **Presentations and other conferences**

- Presented on disability disparities and discrimination in healthcare to the Department of Justice Civil Rights Division.
- Presented on NCD's fetal medicine and germline editing report at the annual conference of the International Society for Prenatal Diagnosis annual conference.
- Presented at a roundtable discussion on Capitol Hill on the matter of Special Medical Underserved Population designation, organized by NGOs.
- Presented on NCD's [Framework to End Health Disparities of People with Disabilities](#) to over 1,000 people at a large, international attendance at a Stanford Medical conference on telehealth.
- Presented on the Framework at a conference of the Accreditation Council on Graduate Medical Education, attended by heads of residency programs from across the U.S.
- Presented on NCD's employment reports at the Department of Energy's National Disability Employment Awareness Month (NDEAM) celebration.

### **Other Engagements:**

- **Opportunities for public input** – NCD continues to engage opportunities for the Council to hear directly from members of the public. We continually receive public comment via all social media platforms on our website as well as to our designated public comment email account. In FY24, NCD collected 127 public comments via email across four live events. This figure does not include comments posted in the chat during NCD's hybrid events.
- **New NCD website and listserv** – In FY24, NCD completed a structural overhaul of our antiquated NCD.gov website by creating and fielding a new beta.ncd.gov official government website on the Federalist Cloud.gov platform. The beta site became the primary website in early FY24 upon completion of content migration that has included over 400 agency reports and 1,300 web pages, and comprehensive security and

accessibility reviews.

- **Virtual Council meetings** – NCD continued to host virtual quarterly Council meetings with increased public participation. NCD's quarterly Council meetings were attended by increasing numbers of people across the country, and topically targeted public comment periods helped provide valuable information for NCD's ongoing research endeavors.

**In Fiscal Year 2025, NCD is prioritizing work in the following areas of focus:**

- Continue to utilize listening sessions and stakeholder engagements in its research that draws upon expertise and perspectives from diverse cross-sections of the community.
- Continue to meet regularly with disability nonprofits throughout the year about the priorities and concerns.
- Continue to look for opportunities to join national conferences in speaking and non-speaking capacities to connect directly with the disability community.

<p style="text-align: center;"><b>GOAL 5</b> <b>OBJECTIVES, STRATEGIC RESULTS and PLANNED ACTIVITIES</b></p>
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**GOAL 5: Enhance agency operational and programmatic internal controls to effectively service execution of statutory duties.**

1. Enhance planning and evaluation of all agency projects to ensure continual improvements.
2. Ensure compliance with financial regulatory and reporting requirements.
3. Regularly evaluate and as needed update internal policies and procedures to ensure federal compliance, improved efficiencies, and internal controls.

**In furtherance of Goal 5, the Council accomplished the following in FY 2024:**

- NCD worked with a Cloud.gov developer to complete transition of our public website from another provider, standardizing and securing processes for creation and revision of digital content. NCD completed the ATU reauthorization process for operating controls under the

Cloud.gov platform.

- NCD improved accessibility processes through its annual government-wide Section 508 assessment, reviewing and fixing important processes across the agency.
- NCD experienced a sizable increase in volume and complexity in receipt of FOIA requests, which created additional staffing and cost burdens to the agency, including costs incurred contracting with an IT provider to search and collect responsive documents. In FY23, NCD received eight FOIA requests and only one request was so complex as to necessitate outside contractual assistance. In contrast, in FY 24, NCD received 27 complex FOIA requests which required NCD to reimburse our IT provider to perform an extensive search for responsive documents on more than five requests. FOIA requests have tripled in volume in the last year.
- The Council continues to work collaboratively with the Department of Homeland Security to implement mandated cybersecurity requirements. We have complied with all mandated requirements to the maximum extent that our budget has allowed.
- Plan of Action and Milestones (POAMs) - The Council continued to work across fiscal years to ensure our IT infrastructure was secure and we were moving toward compliance with all regulatory requirements.
- SharePoint - The Council continued its SharePoint platform development to support the transition to electronic documents as required by National Archives and Records Administration (NARA).
- NCD provided timely submissions to the EEOC MD-715 to reflect NCD's commitment to implementing measures to create a harassment-free culture that promotes inclusive employment opportunities.
- Updates to Administrative and Financial Policies and Procedures - NCD continually monitors and updates our internal policies and procedures in response to agency needs, improving internal controls and in response to government wide directives.
- NCD worked with GSA through our Service Level Agreement to complete coming into compliance with the personnel vetting reforms reflected in Trusted Workforce 2.0.
- NCD reviewed and began updates to its travel procedure to maximize transparency and oversight and to ensure NCD official travel procedures were in compliance with all applicable federal travel regulations.
- NCD continued to implement its contractual agreement for cyber security support to

ensure compliance with all cybersecurity requirements; identify and assess significant risks related to information security; and safeguard information system assets by identifying and presenting solutions to solve potential and actual security problems.

- Plan of Action and Milestones (POAMs) - The Council continued to deploy strategies to ensure our IT infrastructure is secure and move toward continued compliance with all regulatory requirements.
- NCD transitioned financial services vendors from General Services Administration (GSA) to Federal Aviation Administration (FAA) in an effort to secure improved service and financial reporting and internal controls.
- We continued to survey all Council Members and staff following each Council meeting, to capture real-time feedback on an array of considerations regarding the Council meeting content, operations, and improvement opportunities.

**In Fiscal Year 2025, NCD is prioritizing work in the following areas of focus:**

- NCD will continue working to streamline our processes related to oversight of public requests for information (FOIA) and support through our website, allowing NCD to field processes and responses more effectively and securely.
- Plan of Action and Milestones (POAMs) - The Council will continue to work across fiscal years to ensure our IT infrastructure is secure and we are moving toward continued compliance with all regulatory requirements.
- Updates to Administrative and Financial Policies and Procedures - NCD will continue to monitor and update our internal policies and procedures in response to agency needs, improving internal controls and responding to government-wide directives.
- SharePoint - NCD will continue to develop the SharePoint platform and incorporate workflows to improve internal operations and assist in continuity and work process.
- Financial Audit - The Accountability for Tax Dollars Act requirement for the annual preparation and audit of financial statements of smaller agencies was exempted by OMB in recognition of our stewardship. This continues to result in biennial cost savings for the Council. The Council will incur the cost of completing an audit for Fiscal Year 2024 and Fiscal Year 2025 in Fiscal Year 2025.
- NCD will continue to work with EEOC to receive technical assistance and update and



ensure compliance with all federal EEO regulations.

- NCD will continue to promote an environment that ensures its operations include multi-levels of internal controls, and our operational components are safeguarded against waste, fraud, and abuse.
- NCD will continue to review and update our travel procedure to maximize oversight and ensure NCD official travel procedures are in compliance with all applicable federal travel regulations.
- NCD will monitor and implement cybersecurity processes and continue to require cybersecurity training of all employees through NCD's cyber security support agreement. This agreement will continue to assist the agency in complying with all cybersecurity requirements; identifying and assessing significant risks related to information security; and safeguarding of information system assets.
- NCD will complete the process of transitioning financial services vendors to secure improved service and internal controls.

<p style="text-align: center;"><b>GOAL 6</b> <b>OBJECTIVES, STRATEGIC RESULTS and PLANNED ACTIVITIES</b></p>
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**GOAL 6: Recruit, retain, and develop a highly qualified professional staff in order to effectively service execution of statutory duties.**

1. Engage in a human capital management assessment to evaluate staffing and consider opportunities for workforce optimization.
2. Enhance new staff, members, and intern orientation materials and process.
3. Encourage staff to conduct SWOT (strengths, weaknesses, opportunities, and threats) analyses as a means of identifying professional development opportunities and enhancing performance.

**In furtherance of Goal 6, the Council accomplished the following in FY 2024:**

- We experienced the change of Chair due to the former Chair's untimely passing in

December 2023. The Vice Chair served in an Acting Chair capacity for several months until in April 2024, President Biden designated her into the Chair role. During the transition period, NCD more fully oriented the then Acting Chair in a matter of procedural areas and revisited and revised others, such as the timekeeping process, to ensure greater consistency among members in recordkeeping of activity logs and their review and approval.

- The NCD professional staff completely overhauled the onboarding and orientation process and materials to be more gradual and practical for new Council Members in expectation of a filling of the vacancy left by our late former Chairman.
- NCD continued to “right-size” its work schedule and arrangement options.
- As a result of NCD’s spectrum of work schedule and arrangements, NCD conducted an impact analysis and ultimately chose to release approximately 40% of its leased space in reflection of our present and projected real estate needs as well as in a concerted effort to retain ample funding for mission-critical research activities. The reduction in leased space resulted in an approximately \$45,000 savings in FY24 and a projected annualized savings of \$110,000 ongoing, which for NCD is a substantial sum in furtherance of mission-critical work.
- NCD provided intern opportunities to three law school students in FY 2024 and one practicum student.
- NCD participated in the Federal Employee Viewpoint Survey (FEVS) and continually encouraged participation by providing ongoing updates and reminders to management and employees. Staff worked collaboratively to ensure the agency specific questions would provide helpful data to the management team.
- NCD management began quarterly, all-day, cross-team planning sessions to assess recent agency activities, and to identify, discuss, and collaboratively solve operational inefficiencies to great early success.
- NCD continued to invest designated training dollars into its staff and had a nearly staff-wide uptake of Contracting Officer Representative refresh training during the fiscal year.

**In Fiscal Year 2025, NCD is prioritizing work in the following areas of focus:**

- NCD will continue to assess ways in which it can support its staff by furnishing our newly reduced office space with more modular furniture that would facilitate team-

focused spaces for collaboration.

- NCD will continue to hold quarterly all-day, cross-team planning sessions to collaboratively evaluate NCD activities and improve them.

### **CROSS-AGENCY COLLABORATIONS**

NCD's policy advisement is often directed at other federal agencies, and it is vital that we maintain open communication and relationships with agencies across the government for this reason. Additionally, we strive to assist them in hearing from people with disabilities across the country in areas on which they are working. Fostering such cross-agency relationships supports our strategic objective to develop policy recommendations and encourage collaboration. With each policy project, we share our recommendations in advance with the agencies we are examining to ensure technical accuracy and strive to follow up with the same agencies in assessing their implementation of our recommendations. The Council regularly engages with many other federal agencies. Please note the many cross-agency collaborations we have previously highlighted in Goal 3. In addition to those, many others include:

- **White House Office of Management and Budget** – NCD co-led the Community Engagement workstream of the Disability Data Interagency Working Group.
- **CCAM** – NCD attends monthly Coordinating Council on Access and Mobility (CCAM) meetings. As a CCAM member, NCD provides valuable expertise to enhance CCAM's ability to service targeted populations.
- **FEMA** – NCD met with staff and leadership from FEMA to discuss several FEMA proposed rules and to advise FEMA on NCD recommendations from our 2023 report "the Impacts of Extreme Weather Events on People with Disabilities".
- **President's Committee on People with Intellectual Disability (PCPID)** – NCD is a member.
- **Administration on Community Living** – NCD held monthly standing calls with leadership from ACL to update one another on agency work and near-horizon projects.
- **US Access Board** - NCD continued to hold regular calls with leadership from the

US Access Board to update one another on agency work and near-horizon projects.

- **Domestic Policy Council (DPC) Interagency Workgroup on Disability** – NCD joins the Domestic Policy Interagency Workgroup on Disability and its related subcommittees regarding a range of issues identified as agenda items by the Director of Disability Policy at the DPC.
- **The Small Agency Chief Information Officer Council (SACC) and Small / Micro-Agency Chief Information Security Officers Council (SMAC)** – NCD participates in the SACC and SMAC and leveraged the expertise of the forum in relation to our agency's ATO process.
- **The Small Agency General Counsel Group** – NCD participates in a coalition of small agency general counsels for leverage our collective expertise in managing the legal departments of small agencies.
- **AbilityOne** – NCD met with staff and leadership from AbilityOne during its strategic plan updates and rollout as well as for updates regarding its planned activities.
- **Small Agency Council OMB calls** – NCD attends and benefits from these regular calls which help interpret orders and guidance in practical terms for small and micro agencies' application.
- **Internal Revenue Service (IRS)** – NCD remains in regular communication with IRS staff to discuss provisions of the tax code that undermine current disability policy and prevents people with disabilities from attaining employment status for federal employment tax purposes and leaves them ineligible to receive employer-sponsored employee benefits when they choose to work in sheltered workshops.
- **Small and Micro Agency CISO Council (SMAC)** – NCD regularly consults the SMAC for their collective expertise and advisement regarding IT and cybersecurity questions that arise throughout the year.

**NATIONAL COUNCIL ON DISABILITY BUDGET**

<b>DESCRIPTION</b>	<b>FY2025 Appropriated Budget</b>	<b>FY2026 Budget Request</b>
<b>BUDGET TOTAL</b>	<b>3,850,000</b>	<b>3,850,000</b>
<b>PERSONNEL</b>	2,441,065	2,493,534
<b>TRAVEL</b>	270,000	270,000
<b>RENT, UTILITIES AND COMMUNICATIONS</b>	242,378	249,716
<b>PROGRAM, RESEARCH AND PRINTING</b>	125,000	100,000
<b>TRAINING AND PROFESSIONAL ASSOCIATIONS</b>	27,500	25,000
<b>AUDIT</b>	42,500	0
<b>PAYROLL, ACCOUNTING AND HR SERVICES</b>	182,500	185,000
<b>SUPPORT CONTRACT SERVICES</b>	147,357	147,000
<b>INFORMATION TECHNOLOGY</b>	242,000	247,000
<b>PAYMENTS TO FEDERAL AGENCIES</b>	4,750	4,750
<b>SUPPLIES, SUBSCRIPTIONS AND MATERIALS</b>	56,450	59,500
<b>SOFTWARE &amp; EQUIPMENT</b>	30,000	30,000
<b>ANTI-DEFICIENCY</b>	38,500	38,500

## **APPENDIX A**

### **Cost Discussion**

NCD is committed to fulfil its mission of advising the President, Congress, and other federal agencies regarding federal policies' impact on people with disabilities in a cost-effective manner.

- The Council's annualized budget for Fiscal Year 2025 is \$3,850,000.
- The Council's budget request for Fiscal Year 2026 is \$3,850,000.

In Fiscal Year 2026, NCD remains committed to delivering mission critical outcomes while streamlining our operational expenses. We optimize our appropriation in support of NCD's mission to advise the President, Congress, and other federal agencies regarding federal policies that impact people with disabilities by looking for opportunities to economize spending and regularly attempting low- or no-cost alternative methods of fulfilling strategic objectives whenever possible. To further maximize NCD's budget, NCD has also taken advantage of cost savings made available to small and micro agencies by the Office of the Federal Chief Information Officer (OFCIO) office. In so doing, NCD responsibly utilizes taxpayer dollars in support of the national priority to reduce deficits.

## **APPENDIX B**

### **Analysis of Resources**

#### **PERSONNEL**

**FY 2025 Budget Level     \$2,441,065**

**FY 2026 Budget Request   \$2,493,534**

Given NCD's micro staff size, which has remained virtually unchanged in forty years, retaining full-time federal employees is critical to fulfilling the Council's mission. NCD's statute stipulates that the President designates the agency's Chair from among its members, and the Chair appoints an Executive Director for the agency, who serves at the Chair's pleasure. In FY24, NCD continued a then six-year trend of its Executive Director serving from within its existing staffing structure, resulting in the cost-savings of a senior-level management official for the duration of the year. Presently, our Vice-Chair is serving as Acting Chair and has appointed an Acting Executive Director from within NCD's existing staff, thus continuing the trend of additional savings from this line item each month that the internal staff member holds the position. However, in FY25 and FY26, NCD has budgeted the possibility of a Chair change, which could result in a new Executive Director being hired from outside the agency. If this does not happen or happens later than FY25, the additional salary herein reflected would move to the program, research, and printing line item. Additionally, NCD experienced natural attrition through retirement of one of its senior management positions, resulting in a fiscal year savings of approximately \$130,000. In support of President Trump's federal workforce efficiency and reform initiatives, and consistent with the agency's RIF and Reorganization Plan (ARRP), NCD has identified this position to remain vacant in FY26.

- The Fiscal Year 2025 budget level supports 9 Council members and 12 staff (FTEs), one of whom retired mid-fiscal year, and includes mandated salary increase, which includes regularly scheduled performance increases per OPM policy and associated benefits, and a 2.22% increase for NCD employees.
- Our Fiscal Year 2026 budget supports 9 Council members and 11 staff (FTEs), which includes regularly scheduled performance increases per OPM policy and associated benefits.

## **TRAINING AND PROFESSIONAL ASSOCIATIONS**

**FY 2025 Budget Level**                      **\$ 27,500**

**FY 2026 Requested Budget**                **\$ 25,000**

In support of Strategic Goal 6, to recruit, retain, and develop a highly qualified professional staff to effectively service execution of statutory duties, NCD is committed to setting aside training dollars and memberships in professional organizations for all employees. All employees are encouraged to utilize training dollars in support of their professional development and the agency's mission. Accordingly, we endeavor to invest in funding to train, advance, and retain the existing workforce.

- In FY25, we will continue our practice of funding training at \$2,500 per employee per year, and the management and staff will identify skill areas that require or could benefit from deepening and pursue training more robustly.
- In Fiscal Year 2026, we will continue the same.

## **TRAVEL**

**FY 2025 Budget Level**                      **\$ 270,000**

**FY 2026 Requested Budget**                **\$ 270,000**

The largest portion of the Council's travel budget is devoted to the cost of fulfilling our statutory requirement to conduct public meetings no less than four times each year. Additionally, in conjunction with policy development or engagement activities, at times, the Council at times convenes policy forums, focus groups, and conducts interviews that involve travel to gather expert information to inform its research endeavors to advise policymakers. On these occasions, we may travel to relevant stakeholders and subject matter experts or extend invitations to subject matter experts to travel to NCD, and such invitations may include travel-related costs. All travel is processed in accordance with federal travel regulations.

- For Fiscal Year 2025, NCD's travel budget will support three in-person quarterly Council meetings and preparatory activities. The other mandatory meeting was conducted virtually.
- For Fiscal Year 2026, NCD's travel budget supports three in-person quarterly



Council meetings and preparatory activities. The other mandatory meeting will be conducted virtually.

## **RENT, UTILITIES AND COMMUNICATIONS**

**FY 2025 Budget Level** **\$242,378**

**FY 2026 Budget Request** **\$249,716**

We renewed our lease with the General Services Administration pre-pandemic, effective October 1, 2021, for 15 years through September 30, 2031. At that time, we negotiated a reduced cost by entering into a 15-year agreement. The ability to remain at the current location, which is accessible for people with disabilities by three major Metro rail lines and Metro bus, was the primary motivation for renewing the existing lease. With most staff being people with disabilities, and as the federal voice to policymakers of the over 61 million Americans with a wide variety of disabilities, having a location that facilitates accessible engagement has been critically important. Then, in FY23, NCD recognized the significance of the cost savings for our annual budget of accordingly “right-sizing” our office space related to rent and began considering options of reducing our real estate footprint. Accordingly, in late FY24, we released 42% of our leased space back to GSA. (In contrast, NCD’s Fiscal Year 2023 budget allocated \$301,620 to this line item.)

- In Fiscal Year 2025, NCD will fully benefit from the partial lease release in annualized savings of approximately \$100,000.
- In Fiscal Year 2026, NCD will continue to benefit financially from the partial lease release, even as we continue to assess the optimal amount of office space needed in support of the President’s return to work executive actions, which may require resumption of a small portion of the released space.

## **PROGRAM, RESEARCH AND PRINTING**

**FY 2025 Budget Level** **\$125,000**

**FY 2026 Budget Request** **\$100,000**

In support of the mission critical work of the agency, NCD’s program budget supports policy projects related to fulfilling the current policy research priorities of the Council. In addition to

the in-house subject matter expertise of its policy team of attorneys, NCD also occasionally requires the supplementation of external expertise in skillsets not reflected on the current staff such as analysis of complex, layered data sets from the Centers for Medicare and Medicaid Services, for which NCD may utilize a modest amount of its budget to apply those skills to its work in service of thoroughly advising federal policymakers.

- In Fiscal Year 2025, NCD will commence research into the disturbing trend of increased numbers of youth living in nursing homes, placements that are frequently unnecessary and in states far from their families' homess. The writing of this report and the majority of this research will be done in-house but will be supplemented with highly specialized data analysis of the Centers for Medicare and Medicaid Services (CMS) minimum data set by an individual or team equipped with those highly specific skills.
- In Fiscal Year 2026, NCD will commence research into a slate of policy projects, to be determined, voted on and prioritized by the Council Members in the third quarter FY25. The writing and research will be done in-house but a modest sum has been retained in this line item in the instance of topics requiring specialized assistance in particular data analysis methodologies, for instance.

## **AUDIT**

**FY 2025 Budget Level                      \$42,500**

**FY 2026 Budget Request                \$0**

As part of our reform plan and allowed per the Accountability for Tax Dollars Act requirement for an annual preparation and audit of financial statements of smaller agencies, we are exempted by the Office of Management and Budget (OMB) for an annual audit in recognition of the stewardship we have presented through ongoing unqualified audits, and instead do biennial audits spanning two fiscal years. NCD participates in a biennial independent audit to review the Council's internal control over financial reporting in compliance with OMB audit guidance for expressing an opinion on financial statements.

- For Fiscal Year 2025, the biennial audit for FY 2024 and FY 2025 will occur in Fiscal Year 2025 with Fiscal Year 2025 funds. The estimated obligation for an independent audit of NCD's financials is \$42,500.

- In Fiscal Year 2026, we are exempt from performing an annual audit and thus will incur no associated costs.

## **PAYROLL, ACCOUNTING AND HR SERVICES**

**FY 2025 Budget Level                      \$182,500**

**FY 2026 Budget Request                \$185,000**

NCD has long contracted with the General Services Administration (GSA) Commissions and Boards (CABS) for human resource services and Office of the Chief Financial Officer (OCFO) for payroll, accounting, and HR services. Through these interagency agreements, we receive support to complete payroll, accounting, and human resource services. These agreements position NCD to utilize ad hoc services such as legal consultation, human relations support, and other services as identified. We do not have the resources to employ full-time staff with expertise in all areas the agency requires. With oversight and support of professional FTEs, these service level agreements have facilitated NCD operations fulfilling federal requirements. However, owing to some identified shortcomings in the service provision of GSA financial services, in FY23, NCD began the transition of financial services provider from GSA to Enterprise Services Center, which has continued throughout FY24 and will complete in FY25. During the transition, expenses were incurred from two service providers for Fiscal Year 2025, our service budget to support the payroll and accounting services for the agency will decrease reflecting the full onboarding of the financial services contractor and the expiration of the former.

- In Fiscal Year 2026, our service budget to support the payroll and accounting services for the agency will have a modest increase over the FY25 levels.

## **SUPPORT CONTRACT SERVICES**

**FY 2025 Budget Level                      \$147,357**

**FY 2026 Budget Request                \$147,000**

A significant majority of staff and Council members of NCD are people with a variety of disabilities. NCD provides accommodations for employees with disabilities during working hours and at meetings and events, as well as accommodations for invited guests and speakers. NCD also utilizes personal service contractors to assist FTE's in fulfilling duties in support of the agency.

- In Fiscal Year 2025, our contractual services budget supports the operational needs of the agency, reasonable accommodations for staff, members, and invited guests. Our increase in the budget for contractual services reflects an increase in needed accommodation supports based upon our current composition of staff and Council Members.
- In Fiscal Year 2026, our contractual services budget supports the operational needs of the agency and provides reasonable accommodations for staff, Council members, and invited guests. We continue to anticipate a modest increased budget for contractual services reflecting an increase in needed accommodation support.

## **INFORMATION TECHNOLOGY (IT) AND SOFTWARE AND EQUIPMENT**

**FY 2025 Budget Level                      \$ 242,000**

**FY 2025 Budget Request                \$ 247,000**

As a micro agency, we secure outside support to assist in meeting the Council's IT and cybersecurity needs and requirements. Related expenses continue to represent a significant amount of the Council's appropriation. Additional expenses are a result of new and ongoing federal requirements. These costs are ongoing to ensure compliance with all cybersecurity and FISMA mandates, and to assist in the security and protection of all Government networks. NCD is presently pursuing a data migration project to move data from an older end of life physical Domain Controller/File Server to SharePoint and their users to EntraID aimed at modernizing our cloud storage infrastructure. The estimated completion date for this project is the end of May 2025. In addition, NCD has very recently completed a digitization project within the SharePoint environment to become compliant with all National Archives and Records Administration requirements, and we intend to further leverage our SharePoint environment for file-sharing, intranet, and the like in FY26 and beyond. Since FY24, NCD has procured cloud.gov hosting for our website. Cloud.gov has a FedRAMP Joint Authorization Board (JAB) authorization, in compliance with federal security requirements. NCD leverages this compliance to reduce and standardize security-related requirements for our small agency. NCD also utilized Zoom for Government to stream our public meetings and events. Zoom for Government has obtained continuous authorization and approval from FedRAMP JAB. NCD will continue to use funding in FY26 to support these leveraged security capabilities.

- For Fiscal Year 2025, funding is necessary for NCD to move toward fuller and ongoing compliance with IT and cybersecurity mandates. We will also have a full year of service with our current cybersecurity vendor.
- In Fiscal Year 2026, NCD will roll out necessary software to ensure compliance and focus on implementing the following mandates:
  - Manage NCD's risk management framework for security compliance using End to End Enterprises. The risk management framework describes how an agency must access, monitor, and respond to risk;
  - Upload and monitor our agency Plan of Actions and Milestones (POAM's), review and respond to the risk of classified and low, medium, or high and guide the agency toward compliance;
  - Support and upkeep on SharePoint, to ensure compliance with National Archives and Records Administration requirements;
  - Communicate on secured phone lines that are IP-based;
  - Provide ongoing security for the agency by maintaining MTIPS to address high level federal requirements with a secure connection to the public internet in full compliance with OMB's Trusted Internet Connection (TIC); and
  - Employ or contract with a Cyber Security Specialist to write policies, procedures, and standards following OMB & DHS Directives in addition to providing ongoing support and compliance with cybersecurity mandates.

## **PAYMENTS TO FEDERAL AGENCIES**

**FY 2025 Budget Level                      \$ 4,750**

**FY 2026 Budget Request                \$ 4,750**

NCD secures services through interagency agreements with other federal agencies for technical functions such as fingerprinting, HR services as needed, procurements, and security services. Under the oversight of professional staff, utilizing interagency agreements in this way assists NCD in fulfilling federal requirements. In FY26, NCD will meet with its national account manager at GSA with the intention of further leveraging our existing service level agreement (SLA) to shift more HR activities and compliance reporting and explore the potential of offloading additional operations-side functions to GSA, in line with plans in our

agency's ARRP.

- For Fiscal Year 2025, costs are relative to the anticipated needs of the Council in addition to the Council's decision to utilize fee-for-service expertise.
- In Fiscal Year 2026, costs are relative to the anticipated needs of the Council in addition to the Council's decision to utilize fee-for-service expertise.

## **SUPPLIES, SUBSCRIPTIONS AND MATERIALS**

**FY 2025 Budget Level                      \$ 56,450**

**FY 2026 Budget Request                 \$ 59,500**

NCD utilizes professional periodicals, subscriptions, technical publications, and services to conduct legal and other research, stay informed of policy developments and access federal directories in furtherance of its mission. These resources are essential in assisting staff to fulfill mission-critical work for the Council. As a micro agency, NCD utilizes a small budget for office supplies, furniture and general supplies each year, always attempting to first satisfy any need for office furniture by exploring available free options at the GSA warehouse before making purchases. Costs are related to the anticipated needs of the Council during each fiscal year.

- In Fiscal Year 2025, we anticipate the costs of supplies to modestly increase as we adjust to reduced lease space and begin to purchase modular furniture to support our employees in flexible, reconfigurable, and accessible work environments. NCD will explore any available options to this end at the GSA warehouse prior to purchasing any new furniture.
- In Fiscal Year 2026, we anticipate using funds to address accessibility needs in a modular shared workspace, continuing to purchase some furniture to move away from heavy, wood, largely difficult to rearrange or make accessible types and toward more modular, adjustable workstations. NCD will explore any available options to this end at the GSA warehouse prior to purchasing any new furniture.

## **ANTI-DEFICIENCY**

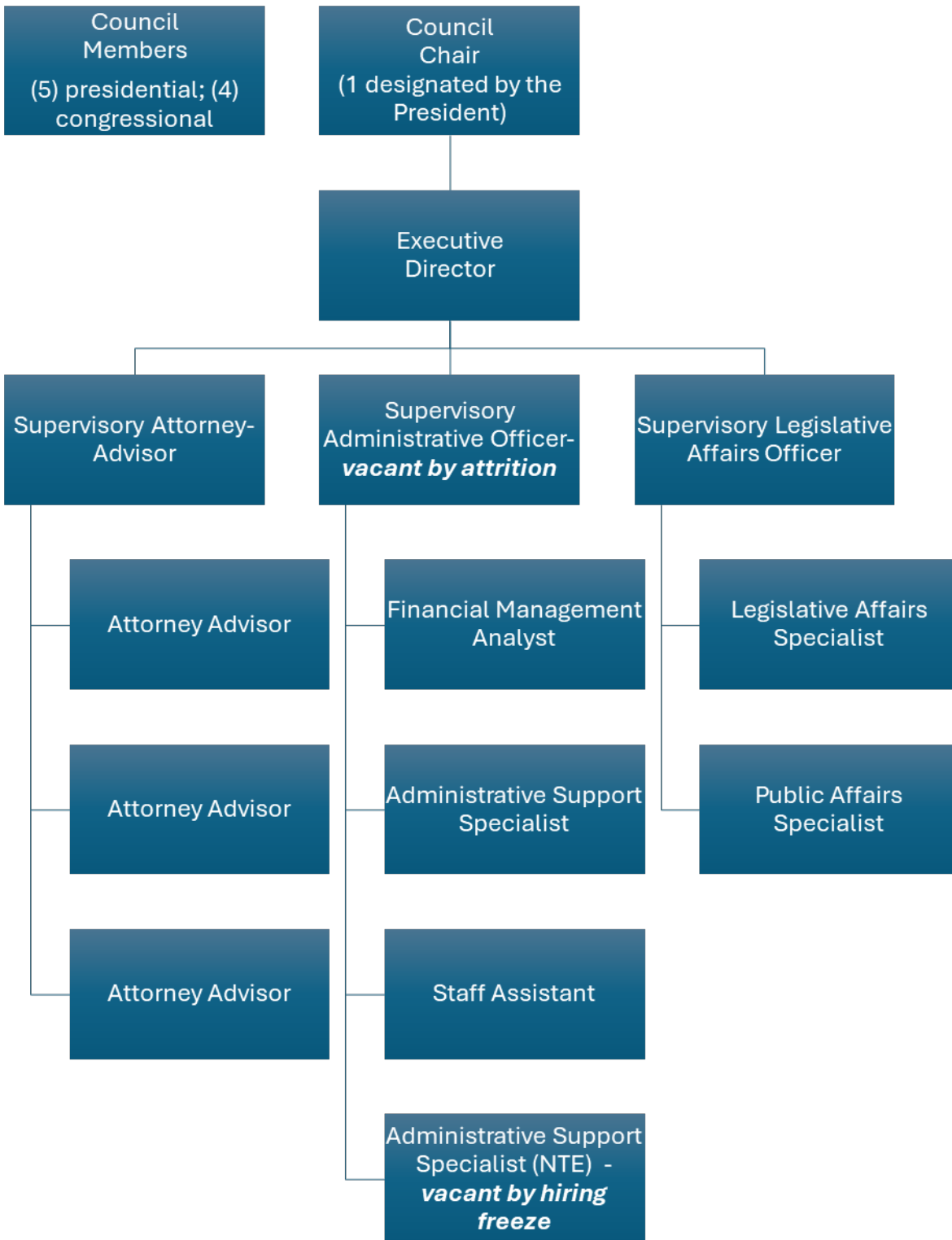
**FY 2025 Budget Level                      \$ 38,500**

**FY 2026 Budget Request                 \$ 38,500**

NCD reserves one percent of its annual appropriated budget for unanticipated expenses and to ensure the Council does not exceed available funds.

## APPENDIX C

### Organizational Chart





## **APPENDIX D**

### **MAJOR MANAGEMENT PRIORITIES AND CHALLENGES**

#### **Costs of Implementing Federal Cybersecurity Requirements**

NCD continues to enhance our cybersecurity program every year. NCD continues to benefit from our Memorandum of Agreement (MOA) with the Department of Homeland Security (DHS) and the Department of Defense (DOD). Our MOA with the DHS, Office of Cybersecurity and Communications ensures the deployment of Cybersecurity capabilities. We continue to deploy Intrusion Prevention Security Services (IPSS) on our networks. NCD continues to make strides to improve our cybersecurity posture by utilizing initiatives in the Federal Government such as the Continuous Diagnostics and Mitigation (CDM) program Federal Government cybersecurity initiative led by the Department of Homeland Security (DHS) and the Cybersecurity and Infrastructure Security Agency (CISA).

In FY 2026, the total budget needed to implement improvements to the efficiency and effectiveness of our operations in the area of cybersecurity is summarized below.

<b>Activity</b>	<b>FY26</b>	<b>Description</b>
Cingular	\$ 6,000.00	Manages NCD's risk management framework for security compliance using Cingular. Risk management describes how an agency accesses, monitors, and responds to risk. A contractor uploads and monitors all of our agency plans of actions and milestones (POAM's) and informs the agency of the risks.
Managed Trusted Internet Protocol Services (MTIPS)	\$ 33,332.00	MTIPS provides security for agencies online traffic and addresses high level federal requirements with a secure connection to the public internet in full compliance with OMB's Trusted Internet Connection (TIC).
Cyber Security Support	\$ 106,668.00	Cyber Security Contractor(s) to write required policies, procedures, and standards in addition to providing support by following OMB & DHS directives & mandates.

Continuous Diagnostics and Mitigation (CDM)	\$ 0	CDM is required by DHS. It helps strengthen the cybersecurity of government networks and systems. This line item is zeroed-out due to the ongoing provision of service through a small agency initiative.
Security Assessment & Authorization	\$ 35,000.00	System Security Plan (SSP) will reveal what system(s) are in place and what support we need. This will also cover penetration testing, which is an ethical hacker that connects to your network in an attempt to obtain passwords. Once the test is completed, NCD will know what to improve. A network risk assessment will also be conducted.
<b>Total Cost</b>	<b>\$ 181,000.00</b>	

## MAJOR MANAGEMENT PRIORITIES & CHALLENGES (continued)

### Costs of developing a workforce for the 21st Century

Management's major priorities for the National Council on Disability for Fiscal Year 2026 are to:

1. Thoughtfully assess agency workforce, workload, and workflow against any applicable executive orders and OMB guidance;
2. Pursue ongoing review and updates to our internal control policies and procedures;
3. Continue compliance with mandated cybersecurity protocols, as the budget allows; and
4. Train, develop, and retain an exceptional workforce, with a priority on hiring a talented workforce, including people with disabilities.

An enduring management challenge is how best to approach the allocation of the Council's limited financial and human resources. By recognizing the expertise of professional staff,

and those staff serving in dual roles for several years, the Council has been operating with eleven full-time staff and nine Council members. The Council members balance their service to the Council with their own full-time careers. Given the breadth of our mission, the scope of our engagement, policy development, and collaborative activities are often limited by the lack of workforce. Our modest budget and small workforce necessitate balancing and prioritizing stakeholder needs with available resources.

Related to the allocation of resources, maintaining a continuity of workforce is both a management priority and challenge. Unlike a larger agency that can withstand numerous vacancies without immediate implication to mission accomplishment or the operational integrity of the Council, in an agency of NCD's size, even a single vacancy can create a palpable effect on the Council's operations and efficiencies. Additionally, with the extent of discrete responsibilities every federal agency faces, regardless of size, individual employees may be the sole individual responsible for and knowledgeable of how to complete tasks. This necessarily creates risk which the Council must account for and control. Therefore, continuity of leadership, employee retention, professional development, desk manual development, and cross-training among employees are always priorities of management as are persisting in efforts to seek opportunities to strengthen and add to the number of staff as funds prove consistently available.

We establish and maintain effective internal control and financial management systems that meet the objective of the Federal Manager's Financial Integrity Act. Based upon the results of the independent auditor's biennial report, we can provide reasonable assurance that our internal control over the effectiveness and efficiency of operations and compliance with applicable laws and regulations is operating effectively and no material weaknesses were found in the design or operation of the internal controls.

NCD publishes several full-length reports every year, in addition to advising and responding to multiple requests on various topics from federal policymakers. Most research projects involve outside contractual assistance. These full-length reports are fulsome research endeavors that entail a broad scope of policy consideration, and/or address an emerging topic or technology that we urge policymakers to consider. While we

will continue to fulfill our mandate to serve policymakers and respond to the disability community's interests and publish annual research/policy reports, we are also an agency with operational requirements in addition to ever greater needs in the disability community to fulfill.

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