



National Council on Disability

FY 2027 CONGRESSIONAL BUDGET JUSTIFICATION

JANUARY 9, 2026

1331 F Street, NW Suite 850
Washington, DC 20004
202.272.2004 (Main)
www.ncd.gov

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.

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 Barriers:** Limited supply of accessible housing has impeded the ability to live in the community and contributed to unnecessary institutionalization.
- **Transportation Barriers:** Inadequate and inaccessible transportation options have hindered or prevented access to employment, healthcare, and community life.
- **Direct Care Worker Shortage:** A shortage of personal care and home health aides has impacted the ability to live at home for both younger and older people with disabilities and strained the health care system.
- **Financial Strain:** Lower wages, underemployment, worker misclassification, and restrictive income limits for government assistance, and unique costs for equipment, have exacerbated poverty and made financial stability hard to achieve.

In Fiscal Year 2027, the Council will continue to prioritize policy issues identified by the disability community, currently consisting of one in every five people in the U.S. We will continue to advise fellow federal agencies and lawmakers on unique issues impacting people with disabilities and their families, so that policies and laws are reflective of those issues. Our budget submission reflects these priorities.

Respectfully,



David Shawn Kennemer

Vice-Chair / Acting Chair

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Introduction

The National Council on Disability (NCD) submits this justification in support of the administration's request of \$3.85 million for NCD for FY27, the same as the FY26 Enacted level. This budget will enable NCD to undertake a slate of projects and supporting activities to achieve our statutory mandated purpose to promote policies, programs, practices, and procedures that guarantee equal opportunity for all individuals with disabilities, regardless of the nature or severity of the disability, and empower individuals with disabilities to achieve economic self-sufficiency, independent living, and inclusion and integration into all aspects of society.

NCD is an independent, bipartisan, executive-branch agency that advises the President, Congress, and other federal agencies through quality research and recommendations on disability policy development, revision, implementation, and on enforcement of the Americans with Disabilities Act (ADA). For decades, NCD's advisement has been critical in preserving and strengthening the ADA.

NCD has a demonstrated record of improving policies for the benefit of people with disabilities in the United States. Government officials, private industry, and the public utilize and reference NCD's reports on a broad range of topics and rely on NCD's recommendations to create and improve policies, laws, and programs related to equal opportunity. Congress has enacted NCD recommendations into law, and federal agencies have implemented many NCD recommendations through rulemaking. Private industry engages with NCD's subject matter experts and leadership on NCD's recommendations and policymakers regularly consult with NCD on its reports and rely on NCD's expertise and assistance. The public relies on NCD reports for information on disability matters and helps inform NCD's research by providing online and in-person public comments throughout the year.

In FY 2025, NCD took substantial steps to carry out its statutory duties and strategic goals. The requested budget of \$3.85 million will enable NCD to continue to undertake its policy analysis and expert advisement on a spectrum of issues impacting people with disabilities.

About the National Council on Disability

A. History and Purpose

NCD was established as an advisory council within the Department of Health, Education, and Welfare in 1978, and soon after placed within the newly separated Department of Education. In 1984, NCD became 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.

In 1986, NCD issued the report, "Toward Independence," which recommended the enactment of a federal disability civil rights law. NCD 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 ADA's broad national disability policy goals. For the past 36 years, NCD has continued to be the nation's primary advisor on disability policies, programs, and practices.

NCD's authorizing statute requires NCD to:

- 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 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;
- 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 policies that operate as disincentives employment;
- Prepare and submit to the President and the appropriate committees of the Congress a report entitled "National Disability Policy: A Progress Report" that assess the status of the Nation in achieving the guarantee equal opportunity for all individuals with disabilities, and empowering them to achieve economic self-

sufficiency, independent living, and inclusion and integration into all aspects of society. The report must have a particular focus on new and emerging issues impacting on the lives of individuals with disabilities and present, as appropriate, available data on health, housing, employment, insurance, transportation, recreation, training, prevention, early intervention, and education. The report must include recommendations for policy change.

Since its establishment, NCD has made hundreds of recommendations based on careful research and the deliberations of its council members in a process that encourages input by the public and government officials. Many of NCD's recommendations have been adopted in laws, policies and regulations that ensure equal opportunity. In conducting our research and formulating recommendations, NCD consistently provides the public with opportunities to provide input for NCD reports and policy advisements by facilitating roundtable discussions, town halls, and panels and maintaining avenues for public comment online and in-person at NCD quarterly meetings.

B. Organization

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. 29 USC 780.

Per the authorizing statute, NCD members must be individuals with disabilities, parents or guardians of individuals with disabilities, national leaders on disability policy, or other individuals who have substantial knowledge or experience relating to disability policy or issues that affect individuals with disabilities. NCD members are appointed to be representative of individuals with disabilities, national organizations concerned with individuals with disabilities, providers and administrators of services to individuals with disabilities, individuals engaged in conducting medical or scientific research relating to individuals with disabilities, business concerns, and labor organizations. A majority of the members must be individuals with disabilities and representative of minority and other individuals and groups. 29 USC 780. Currently, 100 percent of the current council members 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 council members to advise on policy priorities by serving on subcommittees that guide the development and provide reviews of iterative stages of research reports. 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. Once each policy project yields a final draft product, it is shared with the entire Council for review, discussion, refinement if requested, and ultimately, a vote of approval.

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 on its existing body of research and recommendations.

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.

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.

C. 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 council members in fulfilling their duty to advise on policy priorities that will improve the lives of people with disabilities.

A full-time staff of eleven employees supports the work of the council members. 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).

Mission And Strategic Goals (2022–2026)

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 Council's budget submission is submitted in accordance with the Council's Strategic Plan. The Council's FY27 goals will continue to reflect its current FY22-FY26 strategic plan while the Council undertakes preparations for its next five-year plan. The current 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, formative process evaluation, and at the end of each, summative outcome, and impact evaluation.

GOAL 1 OBJECTIVES, STRATEGIC RESULTS AND PLANNED ACTIVITIES
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GOAL 1: Develop new disability policy recommendations with a particular emphasis on issues of healthcare, emergency preparedness, disabled youth residing in nursing facilities, accessible ground transportation, and employment.

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.
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 on including people with disabilities in clinical trials.
7. Develop recommendations on disability data collection.
8. Advise on and promote recommendations to address barriers created by federal income and asset limitations imposed on people with disabilities.
9. 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 FY25:

- 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.
- Released NCD’s 2024 Progress Report: [“National Disability Policy: A Progress Report 2024”](#).

- Released NCD’s report, [“Tax Misclassification: Lost Employment Benefits for Disabled Workers”](#) on March 6, 2025, which examined the definition of “employee” under the Internal Revenue Code (as distinct from the definition under the Department of Labor regulation) and the legal implications of a 1965 Revenue Ruling that may be applied inappropriately to classify people with disabilities as “rehabilitation clients” rather than “employees” creating employment barriers that prevent people with disabilities from attaining full employment status and as a result, ineligible to receive the full array of employment benefits and protections. NCD concluded that this form of misclassification can create a segregated payroll system that is detrimental to workers with disabilities who choose employment in sheltered workshops. Because outdated tax provisions remain in effect and have not kept pace with the evolution of modern disability employment policy and its goals, NCD recommended improved federal oversight, random payroll audits, and criminal prosecutions of willful employment tax fraud is needed.
- Released NCD report, [“Ground Transportation for People with Mobility Disabilities 2025: Challenges and Progress”](#) on July 23, 2025, which highlighted the barriers that people with mobility disabilities continue to encounter in accessing popular modes of transportation, even thirty-five years after the enactment of the Americans with Disabilities Act, which sought to remedy transportation barriers. This report explores successful solutions to increase the availability of wheelchair accessible vehicles (WAVs) through incentives, requirements, and adequate funding, and makes recommendations to policymakers on ways to expand and improve transportation options for this population of people with disabilities among transportation network companies (TNCs), taxi services, paratransit, microtransit, shuttle services, rental car services, and autonomous vehicles (AV).
- Submitted a [Statement for the Record](#) to the U.S. House of Representatives Ways and Means Subcommittee on Health regarding its June 25, 2025, hearing “Health at Your Fingertips: Harnessing the Power of Digital Health Data,” to advise policymakers to ensure that innovations in digital healthcare technologies – like wearable devices used to track vital signs in real-time and remote monitoring devices discussed in the Subcommittee’s hearing - comply with federal accessibility standards for Information and Communication Technologies (ICT) under Section 508 of the Rehabilitation Act of 1973 so that these innovations are useable and operable by people with disabilities. NCD’s Statement highlighted that digital health systems and technology have the potential to improve treatment, management and health outcomes for people with disabilities and lower overall healthcare costs and policymakers should encourage developers to test and ensure these digital technologies comply with ICT standards before they are sold to healthcare providers. NCD’s advisement was informed by its 2021 research in its report [“Enforceable Accessible Medical Equipment Standards: A Necessary Means to Address the Healthcare Needs of People with Mobility Disabilities,”](#)

NCD's 2009 report, "[The Current State of Healthcare for People with Disabilities](#)," and NCD's 2004 report, "[Design for Inclusion: Creating a New Marketplace.](#)"

- Submitted a [Statement for the Record](#) to the U.S. House Oversight and Accountability Subcommittee on Health Care and Financial Services on February 14, 2025 related to the hearing titled "Examining the Growth of the Welfare State, Part I." NCD's Statement highlighted recommendations from its "[2023 Progress Report: Toward Economic Security: The Impact of Income and Asset Limits on People with Disabilities](#)," urging Congress to pass the SSI Savings Penalty Elimination Act (S. 2767 / H.R. 5408) but cautioning policymakers that while this legislation would allow people with disabilities to improve their financial lives by increasing asset limits for individuals and couples, challenges remain regarding how resource limits are assessed for SSI. NCD recommended that Congress re-examine Supplemental Security Income asset and resource rules to allow certain debts to counterbalance countable resources in determining program eligibility.
- Issued a [letter](#) to the Secretary of Health and Human Services offering NCD's assistance in developing the recommendations of the Make America Healthy Again Commission.
- Issued a [letter](#) to the Secretary of Health and Human Services offering NCD's assistance in developing the recommendations of the Make America Healthy Again Commission.
- Submitted an [Advisory Letter](#) to the Illinois General Assembly on May 1, 2025, advancing recommendations in NCD's 2019 report, "[The Dangers of Assisted Suicide Laws](#)" advising state lawmakers not to legalize any form of assisted suicide or active euthanasia but rather to pursue a strong healthcare system that includes long term services and supports for all people, including people with disabilities with and without terminal prognoses.
- Issued a [letter](#) to the Secretary of the U.S. Department of Transportation in June 2025 regarding the U.S. Department of Transportation's Final Rule, "Ensuring Safe Accommodations for Air Travelers with Disabilities Using Wheelchairs."
- Responded to an [Information Request](#) from the U.S. House Committee on Ways and Means regarding the activities of tax exempt Organ Procurement Organizations (OPO) in June 2025. NCD provided the Committee with its research into the experiences of people with disabilities during the organ procurement and donation process from its 2019 reports, "[Medical Futility and Disability Bias](#)" and "[Organ Transplant Discrimination Against People with Disabilities](#)."
- Issued an [Advisory Letter](#) to the U.S. Department of Energy in June 2025 concerning its intended Direct Final Rule to rescind new construction requirements related to disability nondiscrimination in federally assisted programs or activities.

- Submitted an [Advisory Letter](#) to the President in June 2025 regarding Executive Order: “Delivering Most Favored Nation Prescription Drug Pricing to American Patients,” which directs leadership across the U.S. Department of Health and Human Services to communicate most favored nation price targets to pharmaceutical manufacturers to bring prices down in line with other comparably developed nations. NCD highlighted findings and recommendations from its 2019 report, “[Quality-Adjusted Life Years and the Devaluation of Life with a Disability](#)” describing how use of the QALY in standard cost-effectiveness analysis (CEA) results in undervaluing prescription drugs that extend the lives of people with disabilities. NCD offered alternatives to the QALY that NCD analyzed in its 2022 supplemental report, “[Alternatives to QALY-Based Cost-Effectiveness Analysis for Determining the Value of Prescription Drugs and Other Health Interventions](#).”
- Provided input to the Federal Emergency Management Agency concerning FEMA’s public assistance regulations. <https://www.ncd.gov/letters/2024-08-28-ncd-letter-to-fema-regarding-public-assistance-update-proposed-rule/>
- Issued an [Advisory Letter](#) to the Secretaries of the Departments of Homeland Security and Health & Human Services in November 2024, offering the recommendations made in NCD’s 2023 report, “[The Impacts of Extreme Weather Events on People with Disabilities](#).”
- Provided interagency review on the Department of Transportation’s Notice of Proposed Rulemaking on air passenger rights. <https://www.ncd.gov/letters/2025-06-17-ncd-letter-to-dot-secretary-on-enforcement-discretion-of-wheelchair-rule/>

In FY26, NCD is prioritizing work in the following areas of focus:

- Research and develop a policy report with recommendations concerning youth in nursing homes, which NCD’s 2023 report “[Strengthening the HCBS Ecosystem – Responding to the Dangers of Congregate Settings during COVID-19](#)” highlighted as a burgeoning population.
- Research and develop a tool kit regarding emergency management and people with disabilities for state and local governments, and organizations, to help them effectively include the needs of people with disabilities in their disaster/emergency plans. NCD has received ongoing reports in the wake of natural disasters regarding significant gaps and oversights for disability inclusion in all phases of emergency management.
- Research and develop a policy brief with more pointed recommendations concerning disability clinical care and competency training of medical professionals as continued follow-up to NCD’s work in the area of addressing the significant health disparities of people with disabilities.
- 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 NCD’s report and recommendations on improving and expanding accessible transportation options for people with mobility disabilities.
- Continue to advise and brief policymakers on NCD’s 2024 report, [“The Implicit and Explicit Exclusion of People with Disabilities in Clinical Trials”](#), and recommendations on the absence of and need to include people with disabilities in clinical trials.
- Continue to 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>GOAL 2 OBJECTIVES, STRATEGIC RESULTS and PLANNED ACTIVITIES</p>

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 furtherance of Goal 2, the Council accomplished the following in FY25:

- 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; 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 American Medical Association.

- Participated in the 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.
- 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 communicating with the Small Business Administration (SBA) regarding a proposed bill that would require the SBA to collaborate with NCD to enhance entrepreneurship opportunities for people with disabilities.
- Served on the interagency Coordinating Council on Access and Mobility (CCAM), a federal interagency council that works to coordinate funding and provide expertise on human services transportation. The CCAM focuses on programs for three targeted populations: people with disabilities, older adults, and individuals with low income.
- Participated in Amtrak quarterly meetings regarding its efforts to make Amtrak trains accessible and improve the accessibility of Amtrak stations and platforms nationwide.
- Participated in FEMA's disability integration stakeholder workgroups, hosted by the Director of FEMA's Office of Disability Integration and Coordination.
- Participated in meetings of the President's Committee on People with Intellectual Disabilities.
- Continued to engage with the two Central Nonprofit Agencies (CNAs) in the AbilityOne Program – Source America and National Industries for the Blind to discuss new data and policy changes under the AbilityOne program and its impact on their CNA roles. In August 2025, NCD held three meetings with key emergency management subcommittee staff from the U.S. House Transportation and Infrastructure Committee regarding a FEMA reform bill – first about a discussion draft and later about the [bill as introduced](#). Specifically, NCD offered line edits and comments to congressional staff to expressly include and define “at-risk populations” to include people with disabilities as having unique access and functional needs that require additional consideration during all phases of emergency management; ensure that FEMA's requirement to develop and maintain robust regional offices be inclusive of regional disability integration specialists; and expressly include NCD as a convener of a working group to consider the adequacy of

individual assistance efforts for people with disabilities after disasters. NCD also offered draft questions for possible use in a future hearing with the Acting FEMA Administrator.

- In July through August 2025, NCD hosted a virtual [six-part briefing series](#) for Hill staff and members of national disability organizations regarding the key findings and recommendations in NCD's July 2025 "[Ground Transportation for People with Mobility Disabilities 2025: Challenges and Progress](#)" report, in recognition of the 35th anniversary of the Americans with Disabilities Act. Each Wednesday for six weeks, NCD highlighted transportation disadvantages of people with mobility disabilities and the need to expand access to wheelchair accessible vehicles (WAVs) among transportation network companies (TNCs), taxis, Autonomous vehicles (AV), paratransit and microtransit, and rental cars and shuttles. There were over 1,700 RSVPs to NCD's briefing series.
- In April 2025, NCD held a meeting with staff on the Congressional Labor Caucus, which has over 100 congressional members, to provide Caucus staff with a high-level overview of the findings and recommendations in NCD's 2025 report, "[Tax Misclassification: Lost Employment Benefits for Disabled Workers](#)."
- In March 2025, the host of podcast "Tax Notes Talk" interviewed NCD to discuss NCD's recent tax policy report, "[Tax Misclassification: Lost Employment Benefits for Disabled Workers](#)," for its weekly, [conversational podcast](#) that discusses new and emerging developments in tax law at the federal, state, and international level to its audience of tax and finance professionals. A transcript of the episode published on the [Forbes Money Market blog](#).

In Fiscal Year 2026, 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](#), including the issue of disability clinical care and competency training of medical professionals.
- Advise and brief policymakers on emergency management and the needs of people with disabilities.
- Advise and brief policymakers on the current state of accessible transportation for people with mobility disabilities, particularly wheelchair users.
- 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>GOAL 3 OBJECTIVES, STRATEGIC RESULTS and PLANNED ACTIVITIES</p>

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 FY25, 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 FY25:

- Regularly met with House and Senate committee staff, leadership staff, and individual Member staff on a bipartisan basis to discuss how NCD's recommendations can assist in their policy objectives to improve outcomes for people with disabilities.
- Continued to assist the lead sponsor of the Healthcare Extension and Accessibility for Developmentally disabled and Underserved Population Act (HEADS Up Act) (HR 3409), which was reintroduced on May 14, 2025. 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).

- Provided technical assistance to the House Small Business Committee staff in drafting the Think DIFFERENTLY About Disability Employment Act (H.R. 1634), which passed the U.S. House of Representatives on June 4, 2025. H.R. 1634 seeks to expand jobs opportunities within the Small Business Administration (SBA) and 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. The [Committee Report](#) accompanying H.R. 1634 specifically describes NCD as uniquely suited to use its existing resources to help inform the SBA as to how the SBA can support individuals with disabilities. On March 25, 2025, the Congressional Budget Office (CBO) [scored](#) H.R. 1634 and estimated that H.R. 1634 would cost less than \$500,000 over the 2025-2030 period subject to the availability of appropriated funds.
- On June 23, 2025, the U.S. House of Representatives passed the bipartisan Charlotte Woodward Organ Transplant Discrimination Prevention Act ([H.R. 1520](#)) which would advance recommendations from NCD's 2019 report, "[Organ Transplant Discrimination Against People with Disabilities](#)." H.R. 1520 would prohibit discrimination against people with disabilities in the organ transplant system. Additionally, it would prohibit covered entities from determining an individual is ineligible to receive a transplant, deny an organ transplant or related service, refuse to refer the individual to an organ transplant center, refuse to place an individual on a waiting list, or decline insurance coverage for a transplant or related service based solely on the fact that the individual has a disability.
- On July 24, 2025, Senator Chris Van Hollen and House Education and Workforce Ranking Member Robert "Bobby" Scott introduced the bicameral Transformation to Competitive Integrated Employment Act (TCIEA) ([S. 2438 / H.R. 4771](#)) advancing NCD's advice to policymakers creating a national transition framework outlined in our 2020 report "Policies from the Past in a Modern Era: The Unintended Consequences of the AbilityOne Program and Section 14(c)" and 2019 report, "[A Cursory Look at the AbilityOne Program](#)." TCIEA would facilitate the successful transition of people with disabilities currently employed under Section 14(c) and into competitive integrated employment; provide states and individual providers with resources from subject-matter experts in order to transform their business and program models away from the outdated subminimum wage model and into a new model that supports opportunities to enter competitive integrated employment; and incentivize providers that have already demonstrated success in transitioning to the new work model to compete for technical assistance grants to assist other providers and states throughout their transformation efforts.

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 2025 include the following:

- Bloomberg referenced NCD in an [article](#) on subminimum wage.
- CBS and other media outlets included NCD in [coverage](#) of disaster registries.
- NBC News [covered](#) natural disasters and mentioned NCD's letter to Homeland Security concerning institutionalization of people with disabilities after hurricanes Helene and Milton.
- ABC News [referenced](#) NCD in an article on subminimum wage.
- Forbes covered the Tax Notes Talk [podcast](#) with NCD on a 1965 ruling that has allowed employers to misclassify disabled workers.
- The Idaho Press referenced NCD's 2022 report in an [article](#) on the state's family caregiver program.
- The American Bar Association posted an [article](#) on addressing the "School-to-Guardianship Pipeline," referencing NCD's 2018 report of same name.
- The Architect's Newspaper [article](#) included NCD's letter advising Department of Energy Secretary on a proposed rulemaking on building accessibility requirements.
- Psychology Today referenced NCD in an [article](#) on reasonable accommodations.
- Medium mentioned [NCD](#) in its article on Section 504 of the Rehabilitation Act of 1973.
- Manchester Ink covered New Hampshire members in Congress and touched upon the [ThinkDIFFERENTLY About Disability Employment Act](#), which would require the Small Business Administration (SBA) and the National Council on Disability to collaborate to help people with disabilities pursue small business ownership and employment opportunities.
- Truthout referenced NCD's COVID-19 report in an [article](#).
- The Heckinger Report [article](#) cited NCD's 2018 report on IDEA.
- Cabin Fever Magazine referenced NCD in its [article](#) on the accessibility gap in U.S. housing.
- Mother Jones referenced NCD in an [article](#) on a court case regarding hospitals and Section 504 of the Rehabilitation Act.
- FAST Company referenced NCD in an [article](#) on subminimum wages.
- Newsweek published an opinion [piece](#) on assisted suicide referencing NCD.
- The Association of Health Care Journalists referred to NCD in an [article](#) on disparities in care.
- USAToday [op-ed](#) refers to NCD's report on disasters.

- Louisiana Weekly references NCD in an [article](#) on disaster planning.

In FY26, 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 FY26, including reports on disability clinical care and competency training of medical professionals, reasonable accommodations and U.S. courts, improving the outcome of people with disabilities during and after disasters, and youth and young adults in nursing homes.
- 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;">GOAL 4 OBJECTIVES, STRATEGIC RESULTS and PLANNED ACTIVITIES</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 furtherance of Goal 4, the Council accomplished the following in FY25: Meetings and Delegations:

- Met with staff and leadership of numerous disability nonprofits in FY25 to discuss their organizational policy priorities and ensure that their constituencies' concerns are considered and reflected in the work of the Council.
- Held individual meetings with numerous other national disability advocacy leaders to learn about their policy priorities for 2025 and identify topics for potential policy projects for NCD in FY26.
- Presented NCD's 2025 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 to refine NCD's ongoing research.
- Participated in several international events. Delegations with representatives from Uzbekistan, Morocco, Iraq, Algeria, Jordan, 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.
- In FY25, 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 FY25, 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 FY25, NCD entered into cooperative agreements 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 research groups, and individuals that have specialized expertise in certain policy areas to supplement the expertise of our professional staff and Council Members.

Presentations and other Conferences

- Presented at the U.S. Department of Health and Human Services for the Anniversary of the Americans with Disabilities Act.
- Presented on disability employment awareness to the Indianapolis Regional Office of Veterans Affairs; the U.S. Attorney’s Office in Virginia; the Federal Communications Commission; the Department of Justice; Veterans Benefits Administration; and Veterans Affairs.
- Presented at the New York University Health Summit concerning oral healthcare for people with intellectual and developmental disabilities.
- Presented at the American Academy of Developmental Medicine and Dentistry regarding disability clinical care and competency training of oral health and medical professionals.
- Presented at the U.S. Environmental Protection Agency (Texas) on the Anniversary of the Americans with Disabilities Act.

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 FY25, NCD collected seventy-two public comments via email across four live events. This figure does not include comments posted in the chat during NCD’s hybrid events.
- **Virtual Council meetings** – NCD continued to host its quarterly meetings with a virtual component to increase public reach. 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.
- **Streaming YouTube meetings** – NCD successfully streamed an August 2025 Council meeting live via YouTube, further enlarging its reach for remote public attendance, which has steadily increased.
- On January 14, 2025, NCD guest lectured at the University of Hawaii at Manoa’ William S. Richardson School of Law for the class, “Taxes & Social Justice: Vulnerable Populations” to discuss NCD’s tax policy report, “Tax Misclassification: Lost Employment Benefits for Disabled Workers.”

In Fiscal Year 2026, NCD is prioritizing work in the following areas of focus:

- Roll out formal “Requests for Information” through the Federal Register in conjunction with each of NCD’s policy projects to garner enhanced input from subject matter experts, industry, people with disabilities and their families, state and local government, and other interested members of the public who may have relevant information to inform NCD’s research.
- Build up and maintain a more robust online public comment option for the interested public, open for all comments but specifically requesting comment on open projects and providing relevant scoping questions to help narrow the focus of the contributions received.
- 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>GOAL 5 OBJECTIVES, STRATEGIC RESULTS and PLANNED ACTIVITIES</p>

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 2025:.

- The Council continues to work collaboratively with the Department of Homeland Security’s Cybersecurity and Infrastructure Security Agency to implement mandated cybersecurity requirements. We have complied with all mandated requirements to the maximum extent that our budget has allowed.

- NCD completed the process of transitioning financial services vendors to secure improved service and internal controls.
- 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 and executive orders.
- NCD reviewed and continued updates to its travel procedure and transitioned to a traveler-controlled reservation system in pursuit of greater efficiencies.
- 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 continued to refine its technical specifications and requirements for virtual and hybrid meetings to help ensure optimal accessibility and public access.
- 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 and complete the audit in early FY26.

In Fiscal Year 2026, NCD is prioritizing work in the following areas of focus:

- NCD will complete its biennial financial audit for Fiscal Years 2024 and 2025.

- 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, including specifically updating our performance management system to be reflective of the President's heightened focus on accountability and high performance of federal employees.
- SharePoint - NCD will continue to develop the SharePoint platform and incorporate workflows to improve internal operations and assist in continuity and work process.
- NCD will continue to work with EEOC to receive technical assistance and updates 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 follow 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 continue to streamline system security authorizations by leveraging standardized NIST-based controls, maintaining authorizations artifacts in OSCAL-compatible formats where feasible, and aligning assessments and authorization activities with CISO council guidance and existing CDM integrations.

- NCD will support Cyber tool rationalization efforts by inventorying existing security tools, reducing duplicative capabilities, and aligning procurement and visibility requirements with CISA’s CDM program to improve efficiency and cost effectiveness.

<p>GOAL 6 OBJECTIVES, STRATEGIC RESULTS and PLANNED ACTIVITIES</p>

GOAL 6: Recruit, retain, and develop a highly qualified professional staff 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 2025:

- NCD experienced a change of Chair due to the voluntary resignation of the Chair in January 2025. The Vice Chair became the Acting Chair at that time and shortly thereafter named a new Executive Director, both of whose prior experiences and leadership roles with the Council have enabled them to capably lead the agency.
- The NCD professional staff completely overhauled the onboarding and orientation process and materials to be more gradual and practical for new Council Members, executing the new system of onboarding with NCD’s newest congressionally appointed Member in November 2024.
- NCD continued to “right-size” its office configuration and space following a FY 2024 release of approximately 40% of NCD’s leased office space in a concerted effort to retain ample funding for mission-critical research activities in the future, which provided NCD approximately \$110,000 in savings to that end in FY 2025.
- NCD provided an administrative and support staff intern opportunity in FY25, focusing on assistance with the agency’s preparations and responsiveness to the biennial financial audit.

In FY 26, NCD will focus on the following policy areas

- 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 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 other federal agencies. Please note the many cross-agency collaborations we have previously highlighted in Goal 3. In addition to those, others include:

- **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 continues to serve as 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 joined 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 through the end of 2024 and joined several interagency disability workgroup calls hosted by the U.S. Department of Labor's Office on Disability Employment Policy during the first two quarters of 2025 before they were temporarily tabled.
- **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.
- **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

DESCRIPTION	FY2026 Appropriated Budget	FY2027 Budget Request
BUDGET TOTAL	3,850,000	3,850,000
PERSONNEL	2,493,534	2,496,526
TRAVEL	270,000	200,000
RENT, UTILITIES AND COMMUNICATIONS	249,716	253,724
PROGRAM, RESEARCH AND PRINTING	100,000	127,500
TRAINING AND PROFESSIONAL ASSOCIATIONS	25,000	27,500
AUDIT		45,000
PAYROLL, ACCOUNTING AND HR SERVICES	185,000	198,500
SUPPORT CONTRACT SERVICES	147,000	119,000
INFORMATION TECHNOLOGY	247,000	247,000
PAYMENTS TO FEDERAL AGENCIES	4,750	4,750
SUPPLIES, SUBSCRIPTIONS AND MATERIALS	59,500	62,000
SOFTWARE & EQUIPMENT	30,000	30,000
ANTI-DEFICIENCY	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 2026 is \$3,850,000.
- The Council's budget request for Fiscal Year 2027 is \$3,850,000.

In Fiscal Year 2027, 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 increase efficiency and reduce spending.

APPENDIX B: Analysis of Resources

PERSONNEL

FY 2026 Budget Level \$2,493,534

FY 2027 Budget Request \$2,496,526

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 FY25, NCD continued a multi-year trend of its Executive Director appointee coming from within its existing staff, resulting in the cost savings of a senior-level management official for the duration of the year. Additionally, in FY25, an NCD senior manager resigned, resulting in fiscal year savings of approximately \$130,000.

- The FY26 budget level supports 9 Council members and eleven staff (FTEs), regularly scheduled step increases per OPM policy, associated benefits, and performance incentives.

TRAINING AND DUES FOR PROFESSIONAL ASSOCIATIONS

FY 2026 Budget Level \$ 25,000

FY 2027 Requested Budget \$ 27,500

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. NCD encourages all employees to participate in training to develop their professional development and the agency's mission. Accordingly, we allocate funding to increase the skills, knowledge, and abilities of our employees.

- In FY26, we will continue our practice of allocating \$2,500 per employee for training, and the management and staff identify areas that require or would benefit from training.
- In FY27, NCD will continue this practice.

TRAVEL

FY 2026 Budget Level \$ 270,000

FY 2027 Requested Budget \$ 200,000

The largest portion of the Council's travel budget is devoted to the costs associated with fulfilling our statutory requirement to hold public meetings no less than four times each year. Additionally, the Council may convene policy forums, focus groups, and conduct interviews that require travel to gather expert information to inform its research. On these occasions, NCD may travel to relevant stakeholders and subject matter experts or extend invitations to

retained in this line item in the instance of topics requiring specialized assistance in particular data analysis methodologies, for instance.

AUDIT

FY 2026 Budget Level	\$0
FY 2027 Budget Request	\$45,000

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.

- In FY26, we are exempt from performing an annual audit and thus will incur no associated costs.
- For FY27, the biannual audit for FY26 and FY27 will be conducted.

PAYROLL, ACCOUNTING AND HR SERVICES

FY 2026 Budget Level	\$185,000
FY 2027 Budget Request	\$198,500

NCD relies on agreements with General Services Administration (GSA) Commissions and Boards (CABS) for human resource services and more recently, with the Federal Aviation Administration (FAA). These interagency agreements allow us to complete payroll, accounting, and human resources tasks. They enable us to access additional services like legal consultation and human relations support as needed. We lack the resources to hire full-time experts in every required area. With oversight from professional full time employees, these agreements help NCD operate in compliance with federal requirements. NCD looks forward to working with GSA CABS to transition to the Core HCM in FY 2027.

SUPPORT CONTRACT SERVICES

FY 2026 Budget Level	\$147,000
FY 2027 Budget Request	\$119,000

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 FY26, 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 FY27, our contractual services budget will continue to support the operational needs of the agency, provide reasonable accommodations for staff, Council members, and invited guests. We hope for a modest increased in the budget for contractual services to address needed reasonable accommodations and supports.

INFORMATION TECHNOLOGY (IT) AND SOFTWARE AND EQUIPMENT

FY 2026 Budget Level \$ 247,000

FY 2027 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 an Authority to Operate (ATO). An ATO ensures that an information system's security posture, risk levels, and compliance meet acceptable organizational standards before it can be deployed. This process is mandatory for federal agencies. In addition, NCD has 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.

- In FY26, NCD requires funding to move toward fuller and ongoing compliance with IT and cybersecurity mandates.
- In FY27, NCD will continue using 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 secure 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 2026 Budget Level \$ 4,750

FY 2027 Budget Request \$ 4,750

NCD secures services through interagency agreements with other federal agencies for technical functions such as fingerprinting, HR services as needed, travel services, 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 FY26, costs are relative to the anticipated needs of the Council in addition to the Council’s decision to utilize fee-for-service expertise.
- In FY27, costs will remain 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 2026 Budget Level \$ 59,500

FY 2027 Budget Request \$ 62,000

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.

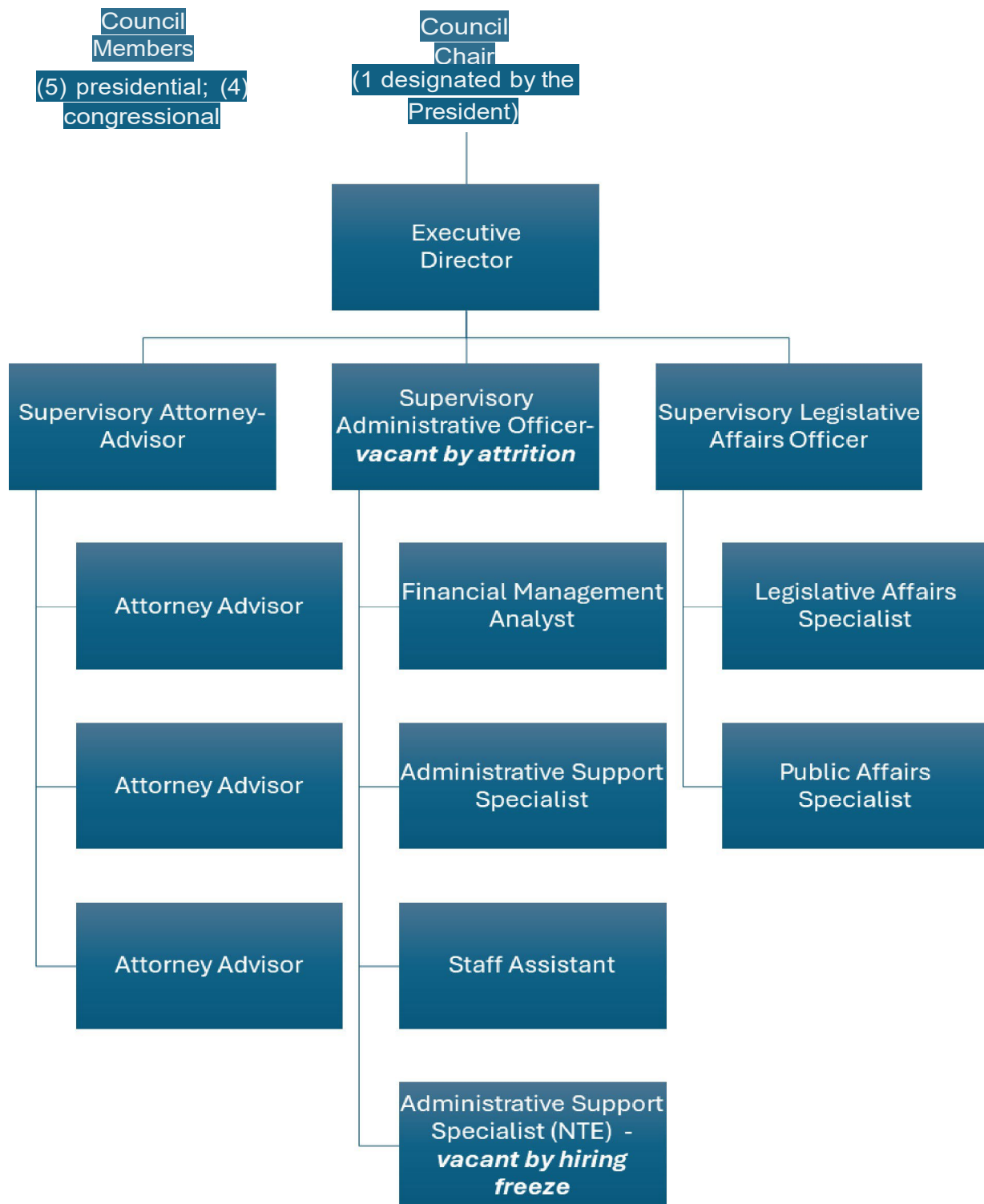
- In FY26, NCD anticipates modest increases for office modifications, following our FY24 release of forty percent of office space. In FY26 NCD also anticipates a modest increase to purchase necessary office supplies.
- In Fiscal Year 2027, we anticipate a minor increase in funds to purchase general office supplies.

ANTI-DEFICIENCY

FY 2026 Budget Level	\$ 38,500
FY 2027 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: Management 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).

For FY26, the budget needed to implement improvements to the efficiency and effectiveness of NCD’s cybersecurity is summarized below.

Activity	FY27	Description
Cingular	\$ 6,000.00	Manages NCD’s risk management framework for security compliance. Risk management is how an agency accesses, monitors, and responds to risk. The contractor uploads and monitors all our agency’s plans of action and milestones (POAM’s) and informs us 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	\$ 100,00.00	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) determines what security system(s) are in place and what NCD needs. This also covers penetration testing, which is an ethical hacker that connects to your network to obtain passwords. The test tells NCD what needs to improve. A network risk assessment is also conducted.
Total Cost	\$ 174,332.00	

Costs of Developing a Workforce for the 21st Century

NCD's management's priorities for FY26 are to:

1. Thoughtfully assess agency workforce, workload, and workflow against any applicable Executive Orders and OMB guidance;
2. Review and update, on an ongoing basis, our internal control policies, and procedures;
3. Continue to comply with mandated cybersecurity protocols, and
4. Train, develop, retain, and hire highly qualified employees, 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, NCD's ability to achieve our full set of objectives is limited by limits on hiring mission critical staff. Our modest budget and small workforce require a constant balancing of our priorities and

needs with our limited resources.

Maintaining the continuity of NCD'S workforce is 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, at NCD, individual employees may carry the sole responsibility for and knowledgeable of how to complete certain tasks, even if we have protocols in place, this creates risk which the Council must control. Therefore, continuity of leadership, employee retention, professional development, standard operating procedures manual development, and cross-training among employees are always priorities of management as is seeking more highly qualified staff as hiring is allowed and funds are consistently available.

NCD has established and maintains effective internal controls 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, which found no material weaknesses, we can provide reasonable assurance that our internal controls over operations and compliance with applicable laws and regulations are operating effectively.

NCD publishes several reports every year, in addition to advising and responding to multiple requests on various topics from federal policymakers. The research and development of many of NCD's research reports require or involve outside contractual assistance. The 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, respond to the disability community's experiences and concerns, publish annual research/policy reports, we must continue to fulfill and comply with operational requirements mandated by the Federal Government.

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