

**TO: Office of Management and Budget  
Office of Federal Procurement Policy**

**FROM: Robin Usalis, President/CEO  
Clovernook Center for the Blind and Visually Impaired**

**RE: Comments in reference to  
Proposed OFPP Policy Letter  
On the acquisition of green products and services**

**DATE: February 26, 2008**

Clovernook Center for the Blind and Visually Impaired is an affiliate agency of National Industries for the Blind and a long time supplier of products and services to the Federal government under the AbilityOne (formerly JWOD) program. In addition to other paper products we manufacture for the Federal government, we are currently the sole supplier of environmentally friendly paper cups to the United States Navy. As a leader in the manufacture of "green" products for the federal government we are encouraged by the proposed policy on acquisition of green products and services. We view this policy initiative is a very positive step toward protecting our environment.

In the thirty years that Clovernook has been involved in the JWOD program, we have seen first hand the positive impact the program has had in providing meaningful employment opportunities for people who are blind. With this in mind we are quite concerned that the procedures established by the JWOD Act be followed when substituting green products and services for existing products on the Procurement List. It is imperative that the proposed policy letter continue the requirement that new products and new NSN's which are introduced as replacements for existing products on the Procurement List go through the AbilityOne program procedures which have been established by the JWOD Act, the Committee For Purchase regulations, and the practices of Federal agencies who sponsor AbilityOne products and services. Also inherent in these policies is the requirement that Federal agencies first consider AbilityOne and other mandatory and preferred sources for "green" products and services where they meet the agency's performance requirements. Anything short of these specific requirements will undermine the processes currently in place to ensure compliance with the JWOD Act.

Thank you for this opportunity to comment.

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