United States Government Accountability Office

Report to Congressional Requesters

January 2024

FEDERAL REAL PROPERTY

Improved Data and Access Needed for Employees with Disabilities Using Secure Facilities

Accessible Version

GAO Highlights

FEDERAL REAL PROPERTY

Improved Data and Access Needed for Employees with Disabilities Using Secure Facilities

Why GAO Did This Study

SCIFs are the only facilities authorized for storing, using, discussing, and processing highly classified information. The Director of National Intelligence, whose organization sets policy for the design, construction, and management of SCIFs, stated that she expects agency leaders to remove barriers to equal opportunities for their workforces, including for people with disabilities.

GAO was asked to review federal agencies' efforts to manage SCIFs and ensure accessibility. This report, among other things, assesses the extent that selected agencies provide physical access to SCIFs and assistive technologies or medical devices in SCIFs. GAO reviewed ODNI guidance, obtained data, visited nine facilities with SCIFs, and conducted interviews. This is a public version of a sensitive report that GAO issued in September 2023. Information ODNI deemed sensitive has been omitted.

What GAO Recommends

GAO is making four recommendations, including that the Director of National Intelligence develop guidance for agencies that identify minimum specifications for common accessibility concerns, address accessibility in inspections, and include consistent procedures for agencies to evaluate assistive technologies or medical devices. ODNI did not provide formal comments on the recommendations.

What GAO Found

The Office of the Director of National Intelligence (ODNI) and selected agencies have taken some steps to address physical access barriers to sensitive compartmented information facilities (SCIF), such as adding automatic door openers. However, additional barriers remain, including:

- Inaccessible entry doors and interior workspaces
- Challenges with electronic door locks and intrusion detection systems
- Absence of tactile signage

ODNI has not issued guidance identifying minimum specifications for common accessibility concerns and addressing accessibility in inspections. Without such guidance, agencies could miss opportunities to strengthen the federal workforce by enhancing accessibility for employees with disabilities.

Physical Barriers to Sensitive Compartmented Information Facilities (SCIFs) at Selected Facilities That GAO Visited
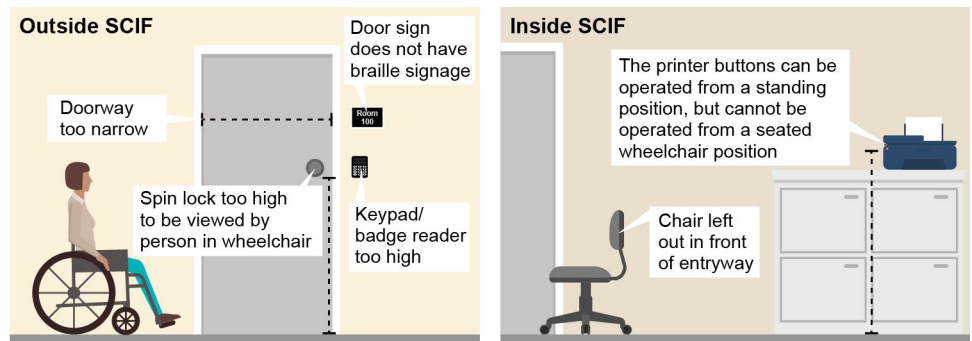
Source: GAO observations and analysis of accessibility guidance; elenabsl/stock.adobe.com (illustrations). | GAO-24-107117

ODNI and selected agencies have enhanced access to assistive technologies and medical devices for people with disabilities working in SCIFs, such as expanding videophones and interpretation services. However, agencies still face challenges ensuring access to these technologies and devices. These challenges include:

- Variation in SCIFs
- Reciprocity with other agencies
- Evolving technologies

ODNI has provided agencies with limited guidance to evaluate options to use assistive technologies and medical devices in SCIFs. Additional guidance would better ensure that people with disabilities can have access to the devices they need to fully and appropriately perform their jobs in SCIFs.

Contents

Abbreviations

CAP	Computer/Electronic Accommodations Program
DOD	Department of Defense
IC	Intelligence Community
ICD	Intelligence Community Directive
ODNI	Office of the Director of National Intelligence
SCIF	Sensitive Compartmented Information Facility

January 9, 2024

The Honorable Clay Higgins
Chairman
Subcommittee on Border Security and Enforcement
House of Representatives

The Honorable Byron Donalds
House of Representatives

The Honorable Julia Letlow
House of Representatives

The proper handling and storage of highly classified information is critically important for the federal government to keep the nation safe. Sensitive Compartmented Information Facilities (SCIF) are the only facilities authorized to process and store sensitive compartmented information—a type of classified intelligence concerning or derived from intelligence sources, methods, or analytical processes requiring protection with formal access control systems.[1] Therefore, these facilities are a key resource for people working in national security or intelligence roles.

The Office of the Director of National Intelligence (ODNI) establishes policy and standards for the construction and management of SCIFs.[2] In this role, ODNI directs how federal agencies are to design and construct SCIFs, manage SCIF security requirements, and report the inventory of SCIFs to a government-wide database. A range of federal agencies owns and operates different types of SCIFs at locations across the world, including members of the Intelligence Community (IC), the Department of Defense (DOD), and other federal agencies. Additionally, SCIF accrediting agencies, referred to throughout this report as SCIF accreditors, are responsible for certifying that SCIFs in the federal

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[1]A sensitive compartmented information facility (SCIF) is an area, room, group of rooms, buildings, or installation accredited as meeting Office of the Director of National Intelligence (ODNI) security standards for storing, using, discussing, and processing sensitive compartmented information. *See* ODNI, Intelligence Community Standard (ICS) No. 700-1, *Glossary of Security Terms, Definitions, and Acronyms* (Apr. 4, 2008).

[2]*See generally* ODNI, Intelligence Community Directive (ICD) No. 705, *Sensitive Compartmented Information Facilities* (May 26, 2010).

government meet ODNI security standards. Specifically, ODNI's guidance to the IC notes that a SCIF accrediting official is to inspect and evaluate SCIFs and issue a formal statement on behalf of the respective SCIF accreditor agency head, or designee, indicating that a SCIF has been designed, constructed, inspected, and certified for the protection of sensitive compartmented information.[3]

In 2021, Executive Order Number 14,035, *Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*, stated that, as the nation's largest employer, the federal government must be a model for diversity, equity, inclusion, and accessibility, where all employees are treated with dignity and respect. The order defined accessibility as the design, construction, development, and maintenance of facilities, information and communication technology, programs, and services so that all people, including people with disabilities, can fully and independently use them.[4]

Also, the Director of National Intelligence has stated that she expects leaders with the authority to take, recommend, or approve personnel actions to partner with equal employment opportunity professionals to identify and remove any institutional, attitudinal, and physical barriers to equal opportunity within the workplace, including for people with disabilities.[5] However, barriers and access issues could affect the ability of people with disabilities to access and work within a SCIF, such as heavy secure doors for someone with mobility issues and limited access to assistive technologies and medical devices.[6]

In December 2020, we reviewed efforts by ODNI and the IC to strengthen workforce diversity—including increasing representation of people with

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[3]ODNI, ICS No. 705-2, *Standards for the Accreditation and Reciprocal Use of Sensitive Compartmented Information Facilities* (Dec. 22, 2016).

[4]Exec. Order No. 14,035, 86 Fed. Reg. 34,593, 34,593-94, §§ 1, 2(e) (June 25, 2021).

[5]Director of National Intelligence (DNI), *Director's Statement on Equal Employment Opportunity* (Apr. 22, 2022).

[6]Further, anyone can acquire a disability over time. The Centers for Disease Control and Prevention reported that in 2022, the prevalence of the U.S. population with any disability was 4.9 percent for those people 18-34 years old compared to 10.3 percent for those 50-64 years old. See Centers for Disease Control and Prevention, *Interactive Summary Health Statistics for Adults – 2019-2022,* Percentage of Any Disability for Adults Aged 18 and over, United States, 2019-2022 (Generated on July 12, 2023 from https://www.cdc.gov/NHISDataQueryTool/SHS_adult/index.html).

disabilities.[7] We found that not all IC elements had developed current and complete diversity strategic plans—including objectives, time frames, and responsibilities to ensure they increase the proportion of people with disabilities, nor completed assessments of potential barriers. We recommended that ODNI and the IC elements issue new guidance or update existing guidance to require all IC elements to maintain current and complete diversity strategic plans with specific objectives, time frames, and responsibilities. We also recommended, among other things, that ODNI and the IC elements routinely complete required assessments to identify and eliminate barriers to workforce diversity. ODNI agreed with our recommendations and, as of September 2023, had taken some steps to address them such as distributing a questionnaire to all IC elements to identify diversity, equity, inclusion, and accessibility challenge areas and develop solutions.

You asked us to review federal agencies' efforts to manage SCIFs, including how ODNI and federal agencies inventory those facilities and ensure access for people with disabilities. This report is a public version of a sensitive report that we issued on September 26, 2023.[8] This report evaluates the extent to which (1) ODNI maintains a complete database of SCIFs at federal agencies, (2) selected federal agencies provide physical access to SCIFs for people with disabilities, and (3) selected federal agencies provide access to assistive technologies or medical devices for use in SCIFs.

Further, this public report omits certain information that ODNI deemed to be sensitive (i.e., For Official Use Only), which could reasonably be expected to cause a foreseeable harm to the U.S. government or other interest protected by law, if disclosed. Therefore, this report omits sensitive information on the identification of the federal agencies that conduct SCIF accreditations and our analysis comparing data in ODNI's database to data maintained by the SCIF accreditors. The report also omits attribution to specific federal agencies in examples cited throughout the report. Although the information provided in this report is more limited,

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[7]GAO, *Intelligence Community: Additional Actions Needed to Strengthen Workforce Diversity Planning and Oversight,* GAO-21-83 (Washington, D.C.: Dec. 17, 2020).

[8]GAO, *Federal Real Property: Improved Data and Access Needed for Employees with Disabilities Using Secure Facilities*, GAO-23-106120SU (Washington, D.C.: Sept. 26, 2023) (FOUO).

the report addresses the same objectives as the sensitive report and uses the same methodology.

For our first objective, we reviewed ODNI's IC-wide and federal agency-specific policies and guidance related to SCIF management and the process for the design, construction, and accreditation of SCIFs.[9] We obtained data from each of the federal agencies responsible for accrediting the SCIFs and compared that data to data maintained by ODNI in the government-wide SCIF database to determine whether ODNI was managing and maintaining a complete inventory of information on SCIFs across the federal government per ODNI guidance and Standards for Internal Control in the Federal Government regarding the use of quality information.[10] We also interviewed officials from each of the SCIF accreditors to discuss how they maintain and report data on their SCIFs.

For our second and third objectives, we reviewed relevant statutes and executive orders related to accessibility at federal agencies, such as how agencies identify barriers and address accessibility for people with disabilities in federal facilities. In addition, we selected 10 federal agencies representing a range of national security missions and uses of SCIFs for facility visits and interviews.[11] We selected a non-generalizable sample of 22 SCIFs at nine different facilities.[12] On those visits, we obtained physical evidence regarding the application of accessibility policies in SCIFs; observed barriers, if any, to accessibility in SCIFs and steps taken to address them; and interviewed officials responsible for managing the SCIF. We also interviewed officials in charge of addressing accessibility at their organizations and members of disability affinity

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[9]For simplicity, we refer to ODNI's IC- or federal government-wide guidance as "ODNI guidance" throughout the rest of the report.

[10]GAO, S*tandards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C., September 2014).

[11]The federal agencies we selected are the Central Intelligence Agency, Defense Intelligence Agency, Department of Homeland Security, Department of Justice, Drug Enforcement Administration, Federal Bureau of Investigation, National Geospatial-Intelligence Agency, National Reconnaissance Office, National Security Agency, and the Office of the Director of National Intelligence.

[12]We selected the 22 SCIFs from five of the 10 federal agencies in our sample. The five agencies we selected are the (1) Department of Homeland Security, (2) Federal Bureau of Investigation, (3) National Security Agency, (4) Central Intelligence Agency, and (5) Defense Intelligence Agency. We selected SCIFs at these facilities to ensure we had a relative mix of (a) headquarters and field locations, (b) SCIFs accredited and managed by the same federal agency and those accredited by different federal agencies, (c) SCIF types and uses, and (d) Department of Defense and other federal agencies.

networks, where available, at the 10 selected agencies.[13] Additionally, we interviewed DOD officials at the Computer-Electronic/Accommodations Program (CAP) office. See appendix I for detailed information on our scope and methodology.

We conducted this performance audit from June 2022 to January 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Types of SCIFs in the Federal Government

SCIFs are areas, rooms, groups of rooms, buildings, or installations accredited as meeting security standards issued by ODNI for storing, using, discussing, and processing sensitive compartmented information.[14] There are permanent, tactical, and temporary SCIFs that are in use across the federal government, each of which has its own design and construction criteria.[15] Additionally, SCIFs can be in buildings, aircraft, and surface or sub-surface vessels. See figure 1 for notional examples of the relative size and types of SCIFs.

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[13]Specifically, we interviewed accessibility officials and affinity groups at the (1) Central Intelligence Agency, (2) Defense Intelligence Agency, (3) Drug Enforcement Administration, (4) Federal Bureau of Investigation, (5) National Geospatial-Intelligence Agency, (6) National Reconnaissance Office, (7) National Security Agency, and (8) the Office of the Director of National Intelligence. Additionally, we interviewed accessibility officials but not affinity groups at the (9) Department of Homeland Security and (10) Department of Justice.

[14]*See* ICS No. 700-1.

[15]Specifically, a SCIF may be established in a hardened structure (e.g., buildings, bunkers) or semi-permanent structure (e.g., truck-mounted or towed shelters or prefabricated buildings) that can be permanent or temporary—i.e., determined to be necessary for a limited time. Airborne and Shipboard SCIFs can be either permanent or tactical—e.g., in use for contingency operations, emergency operations, and tactical military operations.

Figure 1: Notional Examples of Various Sizes and Types of Sensitive Compartmented Information Facilities (SCIFs)

Single room in a building

Multiple rooms in a building

Area/part of building

Whole building

Aircraft

Surface or subsurface vessels

Notional location of a SCIF
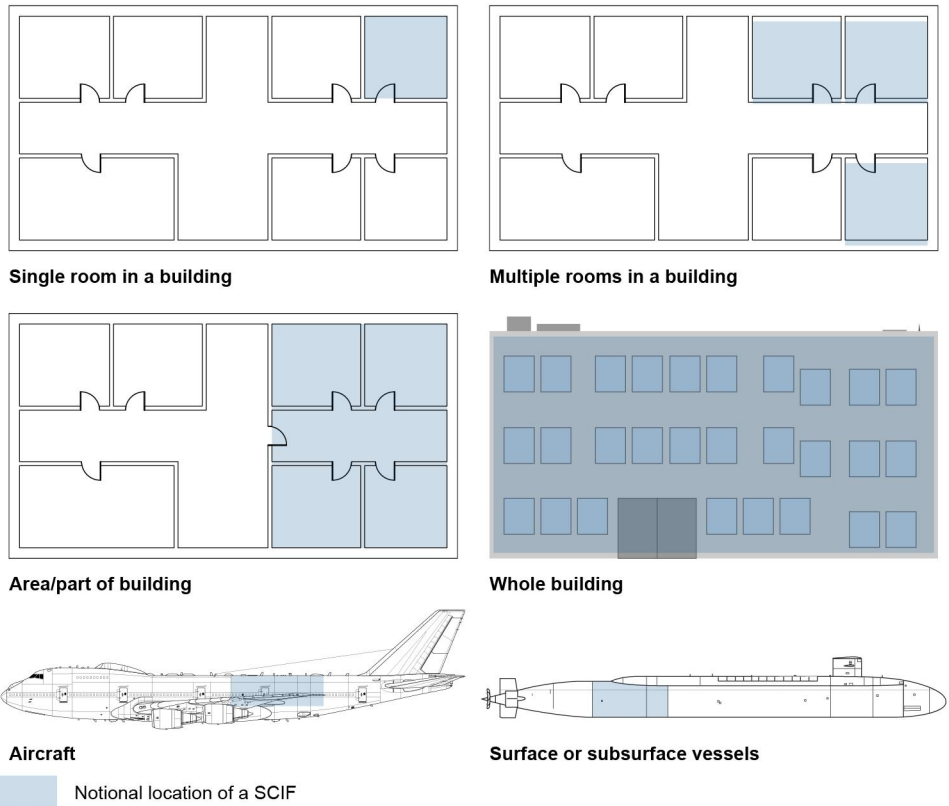
Source: GAO; Alex/stock.adobe.com (aircraft and submarine). | GAO-24-107117

Note: The highlighted areas are intended to give a notional example of areas that could be designated as a SCIF in a building, aircraft, or vessel, and not the actual locations of SCIFs in those examples.

SCIFs also serve a wide range of purposes depending on the mission needs of that SCIF's owner. For example, a SCIF may be

- an individual's designated office location, a conference room, a laboratory, or a document storage area, among other uses;

- designated as secure working areas used for using, discussing, and processing, but not storing of classified material;

- open storage, meaning classified information can be openly stored and processed without approved containers; or

- closed storage, meaning information can be stored only in approved security containers.

SCIF Policy and Responsibilities

ODNI guidance for the IC set forth the physical and technical security standards that apply to all SCIFs, including for the construction and modification of SCIFs. Table 1 summarizes some of the key ODNI guidance on designing, constructing, accrediting, and inventorying SCIFs.

Table 1: Office of the Director of National Intelligence's (ODNI) Guidance for Sensitive Compartmented Information Facilities (SCIF)

ODNI guidance	Relevant excerpts
Intelligence Community (IC) Directive Number 705[a]	• Establishes that all IC SCIFs shall comply with uniform IC physical and technical security requirements. • Identifies that IC element heads are responsible for accrediting, re-accrediting, and de-accrediting SCIFs. Additionally, that authority may be delegated from the IC element head to another official. • Sets forth that ODNI shall manage an inventory of information on all SCIFs. IC elements are responsible for providing information on SCIFs no later than 30 days after updated or new information.
IC Standard Number 705-1[b]	• Sets forth the physical and technical security standards that apply to all SCIFs, including existing SCIFs, new construction, and renovation of SCIFs for reciprocal use by all IC elements and to enable information sharing to the greatest extent possible. • Identifies that ODNI, in consultation with IC elements, shall review and update the Technical Specifications for the Construction and Management of Sensitive Compartmented Information Facilities on an ongoing basis.
IC Standard Number 705-2[c]	• Sets forth the criteria that apply to the accreditation of SCIFs to enable reciprocal use by all IC elements and facilitate information sharing to the greatest extent possible. Any SCIF that has been accredited by a SCIF accreditor shall be reciprocally accepted for use as accredited by all IC elements when there are no waivers issued.
Technical Specifications for the Construction and Management of Sensitive Compartmented Information Facilities[d]	• Serves as the implementing specification for ICD Number 705 and IC Standards Numbers 705-1 and 705-2 with specifications for SCIF design and construction, including different SCIF types. • Restates requirement from ICD No. 705 for IC elements to report information on a newly accredited SCIF, and to update this information no later than 30 days after changes occur to ODNI's government-wide SCIF database.

Source: ODNI Directives, Standards, and Implementing Guidance. | GAO-24-107117

Note: According to ODNI and CIA officials, the ODNI guidance described above is also used by the CIA when accrediting SCIFs that are operated by non-IC agencies.

[a]ODNI, Intelligence Community Directive No. 705, *Sensitive Compartmented Information Facilities* (May 26, 2010).

[b]ODNI, Intelligence Community Standard No.705-1, *Physical and Technical Security Standards for Sensitive Compartmented Information Facilities* (Sept. 17, 2010).

[c]ODNI, Intelligence Community Standard No.705-2, *Standards for the Accreditation and Reciprocal Use of Sensitive Compartmented Information Facilities* (Dec. 22, 2016).

[d]ODNI, Intelligence Community Technical Specification, *Technical Specifications for Construction and Management of Sensitive Compartmented Information Facilities*, v. 1.5.1 (July 26, 2021).

SCIF accreditors are responsible for certifying and accrediting new and modified SCIFs in the federal government and ensuring those SCIFs follow ODNI guidance. ODNI, the SCIF accreditors, and the federal agencies that operate particular SCIFs have responsibilities in the process of accrediting and inventorying SCIFs, according to ODNI's guidance, and as shown in figure 2. When a SCIF is newly constructed or modified, the responsible SCIF accreditor has 30 days to report that SCIF to the database of government-wide SCIFs that ODNI is responsible for maintaining.

Figure 2: Process and Agency Responsibilities for Accrediting a Sensitive Compartmented Information Facility (SCIF)

| **Agency** identifies a need for a sensitive compartmented information facility (SCIF). | → | **Agency** prepares the design and construction plan. | → | **SCIF accreditor** reviews the design package. | → | **Agency** completes SCIF construction. | → | **SCIF accreditor** inspects and certifies the SCIF, if it meets physical and security requirements. | → | **SCIF accreditor** reports the SCIF to the **Office of the Director of National Intelligence** government-wide database. |

Source: GAO analysis of Office of the Director of National Intelligence documentation. | GAO-24-107117

Accessibility-Related Laws, Regulations, and Guidance

Three federal laws and their implementing regulations apply or are relevant to the process for ensuring accessibility in a SCIF. First, according to the U.S. Access Board, the Architectural Barriers Act of 1968 requires that all buildings or facilities designed, built, or altered with federal dollars or leased by federal agencies after August 12, 1968, be accessible.[16] To implement the act, four federal agencies, including DOD and the General Services Administration, are responsible for developing the *Architectural Barriers Act (ABA) Standards*.[17] The standards describe where access is required and provide detailed specifications for ramps, parking, doors, elevators, restrooms, assistive listening systems, fire

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[16]See Pub. L. No. 90-480 (1968) (codified, as amended, at 42 U.S.C. §§ 4151 et seq.). The U.S. Access Board, officially the Architectural and Transportation Barriers Compliance Board, was established in 1973 to ensure access to federally funded facilities. The Architectural Barriers Act excludes buildings that are privately owned residential structures not leased by the government for subsidized housing programs and any building or facility on a military installation designed and constructed primarily for use by able-bodied military personnel. 42 U.S.C. § 4151.

[17]See 42 U.S.C. §§ 4152-4154a; 36 C.F.R. part 1191, Appendixes C, D (2023); 36 C.F.R. § 1191.1(b) (2023). The other two federal agencies responsible for developing the standards are the Department of Housing and Urban Development and the U.S. Postal Service.

alarms, signs, and other accessible building elements.[18] The U.S. Access Board enforces the Architectural Barriers Act by investigating complaints alleging facility noncompliance.

Second, Section 501 of the Rehabilitation Act of 1973, as amended, and its implementing regulations from the Equal Employment Opportunity Commission prohibit federal agencies from discriminating on the basis of disability in regard to, among other things, the hiring, advancement, or discharge of employees.[19] According to an Equal Employment Opportunity Commission official, this includes a requirement for federal agencies to provide reasonable accommodation to employees that enable them to perform the essential functions of their jobs unless it would cause the employer an undue hardship.[20]

A reasonable accommodation is a modification or adjustment (1) to a job application process that enables a qualified applicant with a disability to be considered for a position, (2) to the work environment that enables a qualified individual with a disability to perform the essential functions of a position, or (3) that enables an employee with a disability to enjoy benefits and privileges of employment equal to those enjoyed by an employee without disabilities.[21] Additionally, Section 508 of the Rehabilitation Act requires federal agencies to ensure that, when developing, procuring, maintaining, or using electronic or information technology, the technology is accessible to people with disabilities, unless an undue burden would be imposed on the agencies.[22]

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[18]*See generally* DOD, General Services Administration, Department of Housing and Urban Development, U.S. Postal Service, *Architectural Barriers Act (ABA) Standards* (2015). In 2005, the General Services Administration adopted the standards. 41 C.F.R. § 102-76.65(a) (2023). In 2008, DOD likewise adopted the standards. Deputy Secretary of Defense Memorandum, *Access for People with Disabilities* (Oct. 31, 2008).

[19]Pub. L. No. 93-112, § 501 (1973) (codified, as amended, at 29 U.S.C. § 791); 29 C.F.R. § 1614.203(b) (2023).

[20]Under implementing regulations for the Rehabilitation Act, an undue hardship is, with respect to the provision of an accommodation, significant difficulty or expense incurred by a covered entity, when considered in light of certain factors. The factors include the nature and net cost of the accommodation needed and the overall financial resources of the facility or facilities involved in the provision of the reasonable accommodation, the number of persons employed at such facility, and the effect on expenses and resources. 29 C.F.R. §§ 1630.2, 1614.203(a)(10) (2023).

[21]*See* 29 C.F.R. § 1630.2 (2023).

[22]Pub. L. No. 93-112, § 508 (1973) (codified, as amended, at 29 U.S.C. § 794d).

Third, the Americans with Disabilities Act of 1990, as amended, states its purpose is, among other things, to provide clear, strong, consistent, enforceable standards addressing discrimination against individuals with disabilities.[23] The U.S. Access Board develops minimum guidelines for Americans with Disabilities Act standards, and the Department of Justice and Department of Transportation each issue standards for implementation.[24] Although the act generally does not apply to the federal government, certain provisions or implementing regulations of the act may be applied by agencies to their facilities or apply to federal contractors.

For example, the DOD memorandum adopting the *Architectural Barriers Act (ABA) Standards* in 2008 also stated that the Americans with Disabilities Act may apply to some entities that occupy space on DOD property or are housed in DOD or DOD-funded facilities, such as banks, childcare centers, and fast food stores and that most DOD contractors are likely subject to the act.[25] Additionally, the memorandum stated that standards for nondiscrimination in employment under this act apply to federal employment under Section 501 of the Rehabilitation Act, including standards for elimination of architectural barriers. Separately, ODNI IC Standard 705-1 states that IC agency SCIF design and construction shall be compliant with, among other things, implementing regulations for the Americans with Disabilities Act in public accommodations and commercial facilities.[26]

In addition, in 2021 Executive Order Number 14,035, *Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*, stated that the federal government must strengthen its ability to recruit, hire, develop, promote, and retain United States talent and remove barriers to equal opportunity.[27] The order also directs federal agencies to develop and submit an annual agency diversity, equity, inclusion, and accessibility

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[23]Pub. L. No. 101-336, § 2 (1990) (codified, as amended, at 42 U.S.C. § 12101).

[24]According to the U.S. Access Board, accessibility standards issued under the act apply to places of public accommodation, commercial facilities, and state and local government facilities in new construction, alterations, and additions.

[25]Deputy Secretary of Defense Memorandum, *Access for People with Disabilities* (Oct. 31, 2008).

[26]See ICS No. 705-1; 28 C.F.R. part 36 (2023).

[27]Exec. Order No. 14,035, § 1, 86 Fed. Reg. 34,593 (June 25, 2021).

strategic plan to identity actions to advance and remove any potential barriers to diversity, equity, inclusion, and accessibility.

Assistive Technologies and Medical Devices

A wide variety of assistive technologies and medical devices are available that can help people with disabilities perform their job functions and provide them with life-sustaining medical assistance. An assistive technology is any item, piece of equipment, software program, or product system that is used to increase, maintain, or improve the functional capabilities of persons with disabilities.[28] Assistive technologies can largely be broken down into five categories based upon the disabilities they assist, as seen in the following figure:

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[28]See DOD, *The Computer/Electronic Accommodations Program*, vol. 1 (January 2021). For purposes of this report, we use this definition for assistive technology.

Figure 3: Examples of Assistive Technologies

Communication Aids

Assist people who have voice disorders that may result in the inability to amplify the volume of speech or who are non-verbal.

- Captioning
- Communication access real-time translation (CART)
- Speech generation
- Voice amplifiers

Cognition Aids

Assist people who may experience memory loss, decreased organization or concentration, word finding difficulty, or orientation difficulty due to conditions like dyslexia, stroke, attention deficit hyperactivity disorder, or traumatic brain injury.

- Computer microphones
- Cueing/memory aids
- Noise-cancelling headphones
- Voice recorders

Dexterity Aids

Assist people who may experience limited mobility such as decreased range of motion in the arms, fingers, wrists, back or neck, and decreased muscle control, spasms, paralysis, tingling or numbness.

- Alternate and adjustable keyboards
- Alternative computer control devices and software
- Pointing devices/mice
- Speech recognition
- Word prediction and grammar software

Hearing Aids

Assist people who have hearing conditions that impact their ability to hear, either partially or completely.

- Alerting/signaling devices
- Amplified telephone equipment
- Interpreting services
- Teletypewriters (TTYs)
- Videophones

Vision Aids

Assist people who have vision conditions that impact the ability to see, either partially or completely which can result in blurriness, blind spots, floaters, or tunnel vision, for example.

- Braille displays
- Low vision computer software
- Magnification devices
- Screen readers

Source: Department of Defense guidance and GAO. | GAO-24-107117

Note: This figure describes notional categories of how assistive technologies can be used to aid people in various ways. A specific assistive technology could be the identified reasonable accommodation for a number of different categories.

Alternatively, assistive medical devices are devices that are designed, made, or adapted to assist a person to perform a particular task, such as hearing devices, or to help someone sustain their life.[29] These devices can aid with a variety of medical conditions. Examples of assistive medical devices include, but are not limited to, hearing aids, heart monitors, pacemakers, insulin pumps, glucose monitors, and prostheses (see figure 4).

Figure 4: Examples of Different Medical Devices

Insulin pump

Heart monitor

Hearing aids
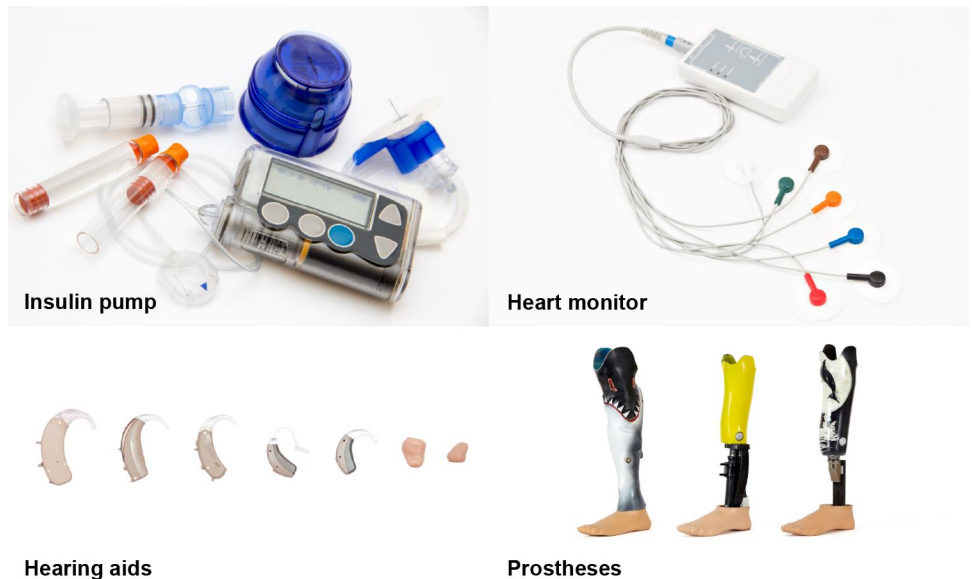
Prostheses

Source: stock56876/stock.adobe.com (insulin pump); malkovkosta/stock.adobe.com (heart monitor); aerogondo/stock.adobe.com (hearing aids); belahoche/stock.adobe.com (prostheses). | GAO-24-107117

ODNI Maintains a Government-Wide Database of SCIFs, but It Is Incomplete

ODNI is responsible for managing and maintaining a database intended to inventory the more than 10,000 SCIFs across the federal government in accordance with IC Directive (ICD) Number 705.[30] According to ODNI officials, information in the government-wide database is intended to

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[29]See C. Khasnabis, K. Heinicke Motsch, K. Achu et al., *Community-Based Rehabilitation: CBR Guidelines* (World Health Organization: 2010). For purposes of this report, we use this definition for assistive medical devices.

[30]See ICD No. 705.

identify potential SCIFs for multiagency meetings, co-use options, and alternatives arising from a national disaster.[31] ODNI guidance requires that SCIF accreditors provide information on all SCIFs into ODNI's government-wide database, to include data on the type of SCIF, when it was accredited, and its physical location, among other information.[32]

In addition to ODNI's database, each of the SCIF accreditors maintain information on the SCIFs they are responsible for accrediting in their respective agency databases. Some SCIF accreditation officials told us that they do not track additional information in their internal databases beyond what is required to be submitted to ODNI's database, while others said that they do. For example, officials at one agency noted that they track the number of phones and computer terminals within the SCIF and contact information for the on-site security representative. See table 2 for examples of databases some of the SCIF accreditors use to track data and some data fields that they track.

Table 2: Examples of Data Collected by Sensitive Compartmented Information Facilities (SCIF) Accreditors in Internal Databases

Federal agency	Method of tracking SCIFs	Additional data fields tracked by that agency[a]
Federal Agency 1	Microsoft Access Database	• Contact information for on-site security representative • Detailed directions to the SCIF • Number of phones and computer terminals
Federal Agency 2	SCIF Records Management Database	• Point-of-contact and assigned security officer for SCIF • SCIF size • Number of total seats in the SCIF
Federal Agency 3	Internally developed FBI database	• Dates of periodic inspections • Description of the facility containing the SCIF

Sources: Federal agency officials and documentation. | GAO-24-107117

[a]In some cases, SCIF accreditors track data elements beyond those required to be reported to ODNI, which we refer to here as additional data fields.

Based on our review of data available in ODNI's SCIF database compared to data maintained by each of the SCIF accreditors, as well as discussions with agency officials, we found that the information in ODNI's

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[31]IC Standard 705-2 states that any SCIF accredited by a SCIF accreditor shall be reciprocally accepted for use by any other IC element when there are no waivers issued, including through co-use or joint-use agreements. ICS No. 705-2.

[32]*See* ICD No. 705 and ODNI, IC Technical Specification, *Technical Specifications for Construction and Management of Sensitive Compartmented Information Facilities*, v. 1.5.1, (July 26, 2021).

database is incomplete. ODNI officials have acknowledged that their government-wide database is incomplete.[33]

ICD Number 705 requires ODNI to manage an inventory of information on SCIFs across the federal government, with SCIF accreditors responsible for providing data on all SCIFs to ODNI no later than 30 days after the completion of new SCIF construction or updated information. According to ODNI officials, ODNI's National Counterintelligence and Security Center is responsible for managing the government-wide database of SCIFs. In addition, Standards for Internal Control in the Federal Government establish that management should use quality information to achieve an entity's objectives.[34] The standards state that quality information is current, complete, accurate, and provided on a timely basis.

Without taking steps to ensure a complete government-wide SCIF database, ODNI does not have quality information on the types, locations, and number of SCIFs across the federal government. This information is essential in allowing agencies to effectively leverage resources through potential co-use agreements and easily identify opportunities for shared SCIF space for multiagency meetings.

ODNI and Selected Agencies Have Taken Steps to Improve Physical Access to SCIFs, but Challenges Remain

ODNI and Selected Agencies Have Taken Steps to Address Physical Access Barriers for SCIFs

ODNI and selected federal agencies have taken steps to improve physical access to SCIFs for people with disabilities. Specifically, through interviews with agency officials and physical observations at selected facilities, we found three broad categories where ODNI and selected

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[33]This report omits certain information that ODNI deemed to be sensitive (i.e., For Official Use Only), to include sensitive information on the identification of the federal agencies that conduct SCIF accreditations and our analysis comparing data in ODNI's database to data maintained by the SCIF accreditors.

[34]GAO-14-704G.

federal agencies have individually taken steps to improve the physical accessibility of SCIFs:

- **Improvements to entryways.** Officials from four of 10 selected agencies told us their agencies have taken proactive steps to improve entryway access to SCIFs, including installing touchless or automatic door openers in new facilities.[35] Also, selected agencies have worked to retrofit older facilities.

- **Inspections of physical access issues.** Officials from two of 10 selected agencies told us their agencies have taken steps to improve accessibility within their facilities by conducting walk-throughs and inspections. Officials at ODNI and one other agency stated that they conduct regular walk-throughs of existing SCIF spaces to ensure continuous access for all employees, including checking for moveable obstructions and ensuring automated door openers remain working. Officials at that other agency also stated that they conduct walk-throughs of all new construction with their disability affinity group to help ensure new construction enhances accessibility beyond statutory requirements, where practicable. As a result of one of these walk-throughs, those officials told us they included handrails on a newly constructed land bridge with a slight slope that were not required by any statutory requirements.

- **Additional efforts to enhance accessibility beyond statutory requirements.** Officials from seven of 10 selected agencies told us their agencies have implemented strategies for enhancing accessibility beyond statutory requirements at federal facilities.[36] For example, officials from four agencies noted that they have created formal partnerships with affinity groups for people with disabilities to design more accessible spaces. Officials from one agency stated that they have made efforts, which we observed, to include accessibility features beyond the requirements in the Architectural Barriers Act of

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[35]The 10 federal agencies we selected are the Central Intelligence Agency, Defense Intelligence Agency, Department of Homeland Security, Department of Justice, Drug Enforcement Administration, Federal Bureau of Investigation, National Geospatial-Intelligence Agency, National Reconnaissance Office, National Security Agency, and the Office of the Director of National Intelligence.

[36]According to the U.S. Access Board, the Architectural Barriers Act of 1968 requires all buildings or facilities designed, built, altered, or leased with federal dollars after August 12, 1968, be accessible. Four federal agencies—including DOD and the General Services Administration—are responsible for developing *Architectural Barriers Act (ABA) Standards*, which generally guide access requirements for federal facilities.

1968 in building planning and design.[37] Officials from that same agency noted that they have implemented a workforce reporting system for accessibility issues to better determine what areas of their facilities were in need of updates or repairs.

Similarly, officials from another agency noted that they developed a form that employees in their facilities can complete that records any accessibility issues and barriers throughout the office. The records are to be submitted to the agency's Equal Employment Opportunity Office. Additionally, officials from at least three of our selected agencies identified that they have made accessibility enhancements to facilities to help ensure all of their buildings provide equal physical access to SCIFs.[38] We also observed that one agency we visited had enhanced accessibility by including ramp access, adding accessible turnstiles, and fitting SCIFs with automatic door openers.

According to the Office of Personnel Management, a federal agency's reasonable accommodation process generally helps make it easier for employees with disabilities to successfully perform the duties of their position.[39] These accommodations also apply to ensuring accessibility to and within SCIFs. Specifically, for all 10 of our selected agencies, the reasonable accommodation process provides a means for employees to ensure equitable access to workspaces. This could include finding a reasonable accommodation to address physical access barriers that does not put an undue hardship on the agency. For example, an employee could submit a reasonable accommodation request for a door that the employee cannot open, and one solution could be installing an automatic door opener to the SCIF.

Physical Barriers Remain across Selected Agencies

While all selected federal agencies we reviewed have taken some steps to improve physical access to SCIFs for people with disabilities, we

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[37]See generally Pub. L. No. 90-480 (1968) (codified, as amended, at 42 U.S.C. §§ 4151 et seq.).

[38]According to agency officials, buildings exempt from certain requirements outlined in the Architectural Barriers Act—such as those constructed prior to 1968—can pose unique challenges to people with disabilities. For example, officials told us that it may not be possible to implement some common physical access enhancements, such as ramps in place of stairways due to the age and configuration of the facility.

[39]*See* Office of Personnel Management, *Reasonable Accommodations*, https://www.opm.gov/policy-data-oversight/disability-employment/reasonable-accommodations/.

identified some physical barriers in certain SCIFs during our visits to SCIFs at nine different facilities at five of our selected agencies.[40] Specifically, we found issues with inaccessible entry doors and interior workspaces, challenges with electronic door locks and intrusion-detection systems, and an absence of tactile signage such as braille (see figure 5).

Figure 5: Physical Barriers to Sensitive Compartmented Information Facility (SCIF) Accessibility at Nine Facilities GAO Visited at Five of the Selected Agencies

	Inaccessible entry doors and interior work spaces			Challenges with electronic door locks and intrusion detection systems		Absence of tactile signage
	Heavy entry doors with no automatic openers	Moveable obstructions	Inaccessible operable parts	Difficult to use electronic spin locks	Alarm panels too high	Does not have braille signage
Facility 1	●			●	●	
Facility 2	●	●	●	●	●	●
Facility 3	●		●	●		
Facility 4	●		●	●		
Facility 5	●	●	●	●		
Facility 6	●	●	●	●	●	
Facility 7	●	●	●	●	●	●
Facility 8						
Facility 9	●			●		

Source: GAO observations and testimonial evidence from selected agencies. | GAO-24-107117

Note: For purposes of this table, a facility may refer to a collection of SCIFs across multiple buildings, a whole building SCIF, or a SCIF within an individual building.

Inaccessible entry doors and interior workspaces. SCIF doors, particularly heavy doors, and entryways can present a barrier to people with disabilities. Specifically, the *Architectural Barriers Act (ABA) Standards* stipulate that a door should require no more than 5 pounds of force to open.[41] However, of the nine facilities we visited, we found SCIF doors at all nine that required more than 5 pounds of force to open.[42]

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[40]ODNI's guidance documents on SCIFs have limited information on addressing accessibility for people with disabilities, but the *Architectural Barriers Act (ABA) Standards* generally guide access requirements for federal facilities. Specifically, IC Standard Number 705-1 states that SCIF design and construction will be compliant with, among other things, certain implementing regulations for the Americans with Disabilities Act where applicable. ICS No. 705-1; 28 C.F.R. part 36 (2023).

[41]DOD, General Services Administration, Department of Housing and Urban Development, U.S. Postal Service, *Architectural Barriers Act (ABA) Standards*, § 404.2.9 (2015). Specifically, the standards state that the force for pushing or pulling open a door or gate other than fire doors shall be, for interior hinged doors and gates and sliding or folding doors, 5 pounds maximum.

[42]To test SCIF doors, we used a mechanical door pressure gauge, a device that measures the amount of force required to open a door. We included both SCIF entry doors and doors within SCIFs at facilities we visited.

Automatic door openers were not present on all of the SCIF primary and interior doors we observed at seven of the nine facilities we visited, and an additional facility had an inoperable automatic opener on one of its doors.

Agency officials told us that SCIF doors are generally heavy due to requirements for those doors to fully close when a person leaves a SCIF and to protect the information inside of it. Moreover, officials at one federal agency told us SCIF doors are occasionally not wide enough for mobility devices, including motorized wheelchairs, and officials at another agency told us automatic openers become inoperable over time and need to be repaired.
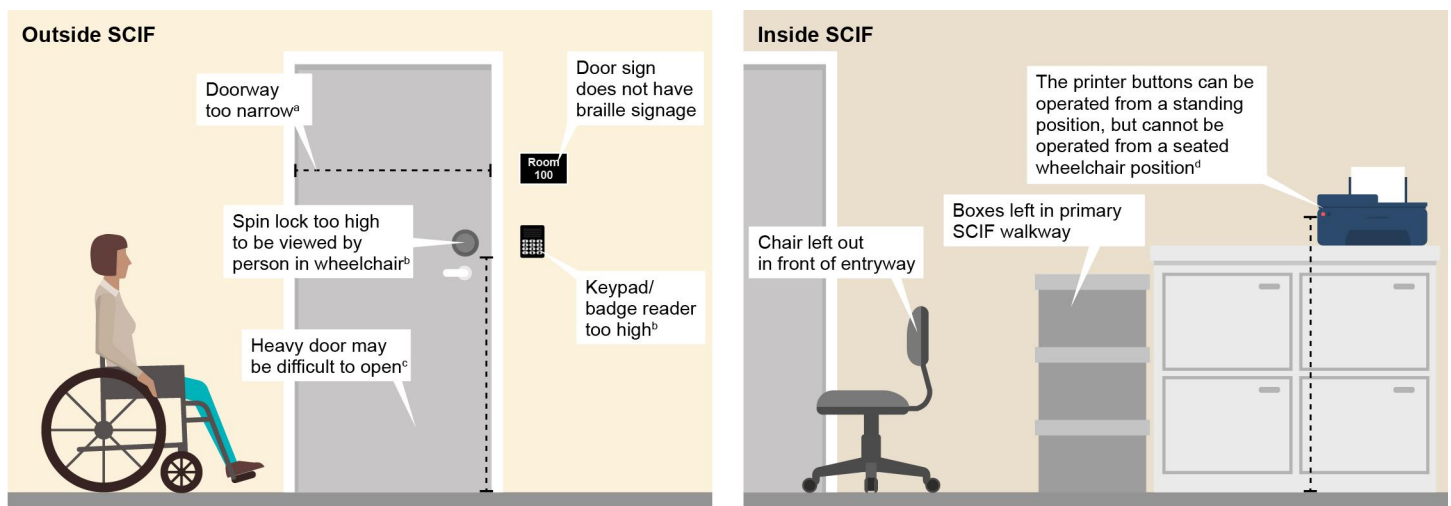
The *Architectural Barriers Act (ABA) Standards* require, in general, a minimum clear width of 36 inches for walking surfaces, with a few exceptions.[43] We found instances of obstructions such as tables, chairs, and boxes positioned such that an employee in a wheelchair would be unable to move throughout the SCIF unassisted at four of the nine facilities we visited. We also found instances where operable parts within SCIFs—such as door handles, printers, phones, or keypads—would be inaccessible to some people with disabilities. Operable parts are components used to insert or withdraw objects, or to activate, deactivate, or adjust an object.

In addition, the *Architectural Barriers Act (ABA) Standards* stipulate that any object with operable parts should be no more than 48 inches off the ground.[44] At six of the nine facilities we visited, we found examples of operable parts that were positioned more than 48 inches above the ground. Figure 6 illustrates some of these potential obstacles.

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[43]*See Architectural Barriers Act (ABA) Standards*, § 403.5.1 (2015). For instance, one exception that the standards provide is that, within employee work areas, clearances on common use circulation paths can be decreased to less than 36 inches by work area equipment, provided that the decrease is essential to the function of the work being performed.

[44]*Architectural Barriers Act (ABA) Standards*, §§ 308.2.1., 308.3.1. (2015).

Figure 6: Potential Obstacles for Entryway and Interior Spaces of a Sensitive Compartmented Information Facility (SCIF)

Outside SCIF

Doorway too narrow[a]

Door sign does not have braille signage

Spin lock too high to be viewed by person in wheelchair[b]

Room 100

Keypad/ badge reader too high[b]

Heavy door may be difficult to open[c]

Inside SCIF

Chair left out in front of entryway

Boxes left in primary SCIF walkway

The printer buttons can be operated from a standing position, but cannot be operated from a seated wheelchair position[d]

Source: GAO observations and analysis of accessibility guidance; elenabsl/stock.adobe.com (illustrations). | GAO-24-107117

[a]The *Architectural Barrier Act (ABA) Standards* stipulate that a door width should be a minimum of 32 inches. DOD, General Services Administration, Department of Housing and Urban Development, U.S. Postal Service, *Architectural Barrier Act (ABA) Standards*, § 404.2.3. (2015).

[b]The ABA standards stipulate that an operable part should be a maximum of 48 inches above the ground. DOD, General Services Administration, Department of Housing and Urban Development, U.S. Postal Service, *Architectural Barrier Act (ABA) Standards*, § 308.3.1 (2015).

[c]The ABA standards stipulate that a door should require a maximum force of 5 pounds to open. DOD, General Services Administration, Department of Housing and Urban Development, U.S. Postal Service, *Architectural Barrier Act (ABA) Standards*, § 404.2.9 (2015).

[d]The ABA standards stipulate that an operable part should be a maximum of 48 inches above the ground. DOD, General Services Administration, Department of Housing and Urban Development, U.S. Postal Service, *Architectural Barrier Act (ABA) Standards*, § 308.3.1 (2015).

Challenges with electronic door locks and intrusion detection systems. SCIF locking and intrusion detection mechanisms can pose challenges for people with disabilities. According to ODNI's Technical Specification for SCIFs, the primary SCIF door must be fitted with deadbolt locking hardware, among other things.[45] Agency officials told us electronic spin locks with digital screens are primarily used to secure SCIF doors. However, according to these officials, electronic spin locks are challenging or impossible for many people with disabilities to open, as they require grasping and turning hand motions.

Moreover, the digital screen of electronic spin locks cannot be seen by people with visual impairments, nor can it be easily viewed from a

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[45]ODNI, IC Technical Specification, *Technical Specifications for Construction and Management of Sensitive Compartmented Information Facilities*, v. 1.5.1. (July 26, 2021).

wheelchair because of its height from the ground. We observed high security electronic spin locks in use at eight of the nine facilities we visited. Some agencies used electronic spin locks to secure SCIF entryways, classified material storage containers (see figure 7), or a combination of the two. Officials at three of the selected agencies confirmed that electronic spin locks could be challenging to use for people in wheelchairs or people with visual impairments. According to officials, when people with disabilities are unable to operate security control mechanisms, they may be unable to open or close a SCIF door without assistance.

Figure 7: Potential Physical Access Challenge with Electronic Spin Locks on a Storage Container
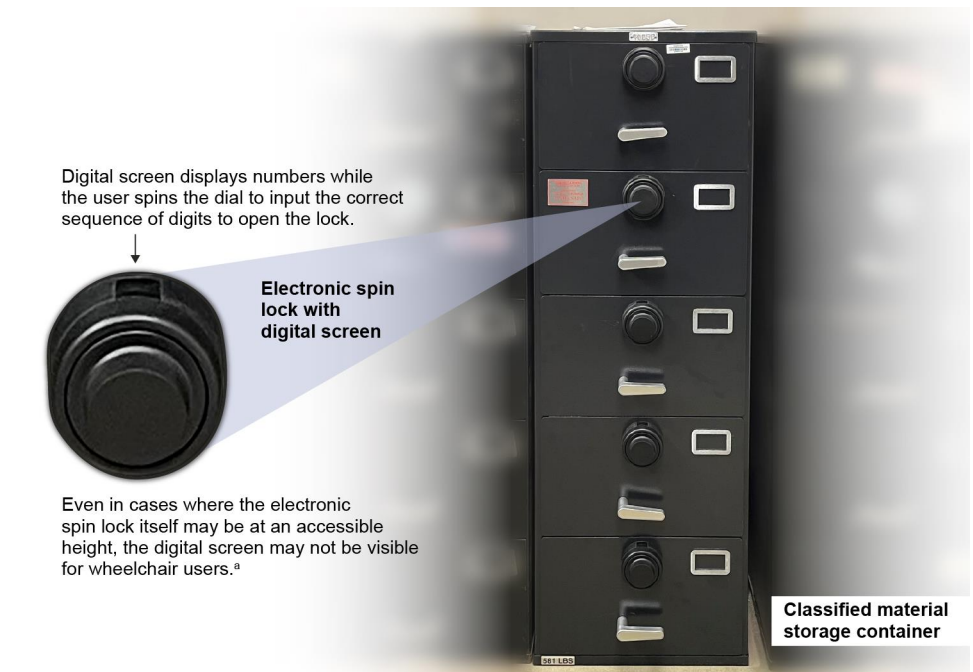
Source: GAO. | GAO-24-107117

[a]The *Architectural Barrier Act (ABA) Standards* stipulate an unobstructed operable part should be a maximum of 48 inches above the ground. DOD, General Services Administration, Department of Housing and Urban Development, U.S. Postal Service, *Architectural Barrier Act (ABA) Standards*, §§ 308.2.1, 308.3.1 (2015).

Additionally, ODNI's Technical Specification for SCIFs requires that all SCIFs be outfitted with an intrusion detection system or other countermeasures if cleared personnel cannot continuously occupy the

area.[46] We found alarm panels that were greater than 48 inches above the ground-level at four of the nine facilities we visited, which exceeds the *Architectural Barriers Act (ABA) Standards* for operable parts.[47]

Absence of tactile signage. Some SCIFs did not have adequate tactile signage (e.g., braille), making them difficult to access for employees with visual impairments. Tactile signage can be the signs outside of a SCIF indicating the room number or division owning the SCIF, but it can also refer to raised characters on keypads so employees with visual impairments are able to disarm and enter a SCIF. Two of the nine facilities we visited did not have tactile signage available at every SCIF or keypad we viewed, and officials at two additional agencies noted tactile signage was not present on some SCIFs, so individuals with visual impairments would not know which room was signified by the sign.

Through interviews with officials and physical SCIF observations at our selected facilities, we found that SCIFs located in newer buildings were more likely to have relevant accessibility features. We also found several areas of common accessibility concern where officials told us or we observed that they had prioritized incorporating relevant security features rather than certain accessibility features. In circumstances where a SCIF incorporated relevant security features but not relevant accessibility features, officials told us their agencies would correct to the minimum accessibility standard only when requested by an employee through the agency's reasonable accommodation process. In these situations, agency officials told us they always made a good faith effort to meet the minimum accessibility standards, but prioritized mission need until a reasonable accommodation request was received to make a space more accessible.

IC Policy Guidance Number 110.1 states that IC elements shall be model employers for individuals with disabilities.[48] Further, ODNI's *Joint Strategy to Advance Equal Employment Opportunity, Diversity, and Inclusion Within the United States Intelligence Community (2020-2023)* states that to maintain global competitive advantage through its workforce, the IC will place emphasis on, among other goals, promoting workplace equality by

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[46]ODNI, IC Technical Specification, *Technical Specifications for Construction and Management of Sensitive Compartmented Information Facilities*, v. 1.5.1. (July 26, 2021).

[47]*Architectural Barriers Act (ABA) Standards*, §§ 308.2., 308.3. (2015).

[48]ODNI, IC Policy Guidance No. 110.1*, Employment of Individuals with Disabilities* (Feb. 26, 2019).

ensuring the right resources are in place to eliminate barriers to equal access.[49]

ODNI has guidance on the design and construction of SCIFs, but we found that guidance has limited information on ensuring physical access for people with disabilities. For example, ODNI has not identified minimum specifications for common accessibility concerns in its guidance to the IC, including for automatic door openers, accessible door locks and intrusion detection systems, and tactile signage. Specifically, ICD Number 705 does not include any specific references to accessibility for SCIFs, and IC Standard Number 705-1 notes only that SCIF design and construction shall be compliant with, among other things, certain implementing regulations for the Americans with Disabilities Act where applicable.[50] ODNI's Technical Specification for SCIFs contains more direct accessibility provisions, stating that all SCIF perimeter doors must comply with, among other things, accessibility requirements as determined by the authority having jurisdiction.[51]

Officials at one of our selected agencies told us that even when a SCIF is constructed to conform to the *Architectural Barriers Act (ABA) Standards*—or if a SCIF's specifications go beyond the requirements of these standards—over time the SCIF can become inaccessible for people with disabilities through lapses in maintenance or moveable obstructions. Officials at one agency said they address these challenges through regular or random accessibility inspections of SCIFs. ODNI guidance requires that SCIFs be inspected for initial accreditation and annually afterward.[52] However, ODNI has not specified in its guidance that these inspections include an accessibility review.

Officials at one agency told us they implemented accessibility inspections to ensure that their SCIFs remained accessible for all employees.

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[49]ODNI, *Joint Strategy to Advance Equal Employment, Opportunity, Diversity, and Inclusion within the United States Intelligence Community (2020-2023)* (August 2020).

[50]Specifically, IC Standard Number 705-1 states that the SCIF design construction shall be compliant with part 36 of title 28, Code of Federal Regulations where applicable. ICS No. 705-1.

[51]ODNI, IC Technical Specification, *Technical Specifications for Construction and Management of Sensitive Compartmented Information Facilities*, v. 1.5.1. (July 26, 2021).

[52]*See* ICS No. 705-2; ODNI, IC Technical Specification, *Technical Specifications for Construction and Management of Sensitive Compartmented Information Facilities*, v. 1.5.1. (July 26, 2021).

Specifically, those officials noted that the agency has a regular inspection schedule, using a 10-year sustainment plan to check for accessibility requirements. The officials stated that they also made use of an Architectural Barriers Act-focused team that conducted internal accessibility inspections of new and old SCIF spaces, checking for issues such as inoperable automatic door openers and moveable obstructions in front of doors or within workspaces.

We found that ODNI has not provided guidance that addresses accessibility in the annual SCIF security inspection process. This process could include an accessibility checklist to all federal agencies to identify and address common physical access barriers to and inside of SCIFs. Providing guidance to ensure the SCIF security inspection process addresses accessibility helps to ensure spaces stay accessible over time. Officials at one agency noted that such inspections have helped them identify faulty automatic door openers and moveable obstructions, such as storage boxes or furniture blocking access to a push or pull door.

ODNI officials told us they were in the process of revising ODNI's SCIF guidance, but as of June 2023 that revision had not been finalized. Without updated guidance that identifies minimum specifications to address common physical access concerns to SCIFs and addresses accessibility in the annual SCIF security inspection process, federal agencies could miss opportunities to strengthen the federal workforce by promoting diversity, equity, inclusion, and accessibility for people with disabilities. When workspaces in federal buildings, such as SCIFs, are inaccessible to people with disabilities, federal agencies may have difficulty retaining those employees for whom access poses a unique challenge.

Selected Agencies Enhanced Access to Assistive Technologies and Medical Devices in SCIFs, but Challenges Remain

Some Selected Agencies Have Expanded Access to Assistive Technologies and Medical Devices for People with Disabilities in SCIFs

Based on our review of 10 federal agencies, we identified the following examples of steps taken to expand access to assistive technologies and medical devices for people with disabilities whose work requires them to be in a SCIF:

- **Expanding sign language services via videophones.** Officials at one agency reported that they are using videophones—one type of assistive technology—to expand access to sign language interpretation services. During the COVID-19 pandemic, according to officials, the agency launched three centralized video remote interpreting hubs from which sign language interpreters provide services for deaf and hard of hearing employees in all agency locations. Further, these services are available at both domestic and international locations and within both classified and unclassified spaces. According to agency officials, this solution—the first of its kind in the IC—has allowed the agency to support more requests for sign language interpretation than was previously possible when interpreters and employees were co-located. Additionally, this effort has improved accessibility across the agency.

- **Employing video relay services.** Officials at another agency stated they have been able to employ webcam-based video relay services.[53] These services have been installed at the individual workstations of deaf intelligence officers to assist them with their work duties. Additionally, that agency was testing talk-to-text tablets that will be used throughout SCIFs. These tablets will help enable conversations

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[53]Video relay service is a form of telecommunications relay service that enables persons with hearing disabilities who use American Sign Language to communicate with voice telephone users through video equipment, rather than through typed text. Video equipment links the user with a communications assistant so that the user and the communications assistant can see and communicate with each other in signed conversation.

between deaf and hard-of-hearing individuals and their colleagues, according to agency officials.

- **Establishing the CAP at DOD.** DOD established CAP to provide assistive technologies and accommodations to support people with disabilities throughout the department in accessing information and communication technologies. CAP provides a number of services, including assistive technologies to DOD employees free of cost, individualized needs assessments to DOD people with disabilities, consultation services to all federal agencies on assistive technologies and accommodations, and training and education. For example, CAP maintains a room at the Pentagon where individuals can test and compare various assistive technology solutions in person, see figure 8. Also, CAP provides education to managers and supervisors on how assistive technologies enables people with disabilities to have equal access to the information environment and be effective members of the workforce.

Figure 8: Photo of Room Used by the Computer-Electronic/Accommodations Program (CAP) for Testing and Comparing Assistive Technologies
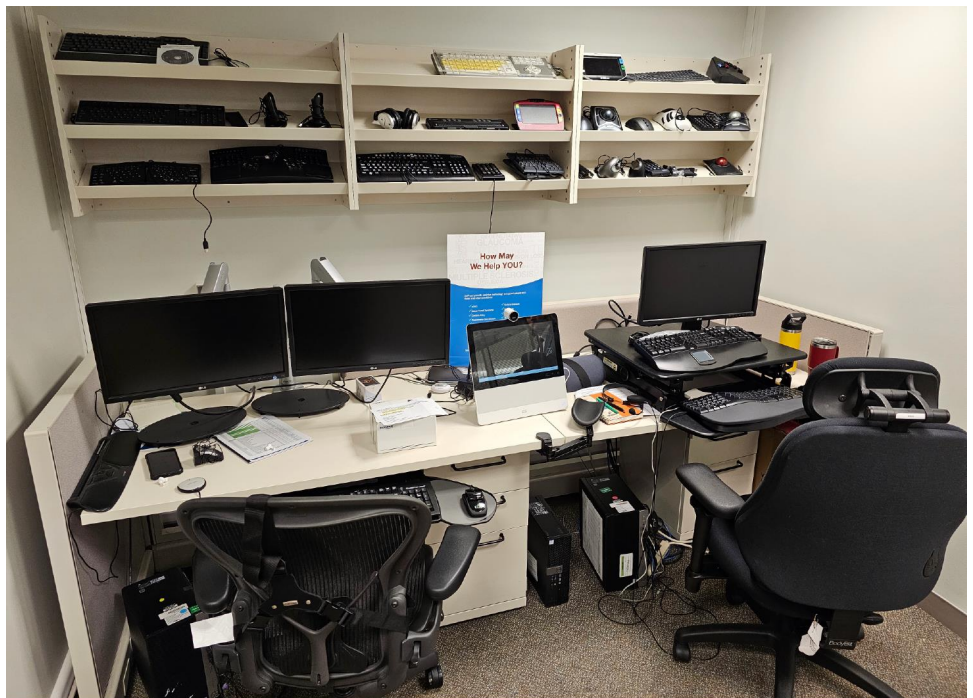
Source: GAO. | GAO-24-107117

Selected Agencies Face Challenges in Providing Employees with Access to Assistive Technologies and Medical Devices

We identified three ongoing challenges at the 10 selected agencies related to ensuring access to assistive technologies and medical devices in SCIFs for people with disabilities, including:

- **SCIF variations.** The agencies we reviewed maintained many different kinds of SCIFs and each SCIF had specific security countermeasures in place. According to five of the 10 agencies we reviewed, this variation can affect the kinds of assistive technologies and medical devices approved for use in SCIFs. For example, officials from one agency stated that every IC element has different security requirements and there is no universal security requirement for the kinds of assistive technologies and medical devices that are approved for use in SCIFs. According to those officials, this creates a challenge for the agency because they do not know what kinds of devices are approved for use at other agencies. Also, different mitigation strategies may be required to allow the use of assistive technologies and medical devices in different SCIFs.

- **Reciprocity with other agencies.** According to seven of the 10 agencies we reviewed, the variation in SCIFs and inconsistent policies between agencies can present reciprocity challenges for employees with assistive technologies or medical devices. Specifically, employees may miss opportunities to participate in multiagency meetings outside of their home agency or be unable to access career advancement opportunities, such as joint duty assignments across the IC, if the approved assistive technologies or medical devices at their agency cannot be used in another agency's SCIF.

  Officials at those seven agencies provided a number of examples where they encountered reciprocity challenges. An official at one agency noted that it can be challenging to meet accessibility needs for employees on joint duty assignments at other agencies, because the employees' agency is not able to control what software or equipment the other agency will provide for people with disabilities. Officials at another agency stated that they have had success in getting reciprocity for an individual requiring a medical device in a SCIF outside of their home agency, but noted that it was a manual process that required a significant amount of work.

- **Technology evolution.** Assistive technologies or medical devices available on the market are constantly changing and evolving, according to officials from eight of 10 selected agencies, and this can affect the kinds of assistive technologies and medical devices approved for use in SCIFs. Moreover, officials from one agency noted that assistive technologies and medical devices are increasingly becoming more sophisticated and interconnected, which makes security reviews more challenging across the IC. Additionally, officials from another agency told us that technologies are increasingly relying on Wi-Fi and Bluetooth communication—capabilities that are generally prohibited in SCIFs.

  Officials at another agency stated that as assistive technologies and medical devices are increasingly connected to the internet and smartphone applications are used for a wider variety of purposes, the agency will need to determine how to balance SCIF accessibility with the security vulnerabilities that can result from the use of these devices. For example, officials at that agency told us that the Food and Drug Administration recently approved access to over-the-counter hearing aids, which could result in an increased number of requests for approval of these devices. Additionally, there are many new devices on the market, such as glucose monitors and leg sensors, so the agency's security team has been busy addressing requests to approve devices. Agency officials stated that as technology continues to evolve, their strategies for mitigating risks associated with assistive technologies and medical devices will have to evolve as well.[54]

ODNI Has Provided Limited Guidance to Evaluate Options to Use Assistive Technologies and Medical Devices in SCIFs

Assistive technologies and medical devices are essential for ensuring that people with disabilities have comparable access to information and data. However, we found ODNI's Technical Specification for SCIFs provides

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[54]For example, officials at this agency have found ways to mitigate risks associated with Bluetooth hearing aids and other devices. However, some devices are now powered by Bluetooth Low Energy, a new version of Bluetooth technology, which has created significant technical challenges with mitigating the risks associated with this technology and agency officials have to begin anew with learning how to mitigate those risks.

limited guidance on how agencies should evaluate assistive technologies and medical devices for use in SCIFs.[55]

ODNI's guidance states that, at a minimum, assistive technologies and medical devices must be reviewed to determine any technical security issues introduced by the device. Officials determine the device's risk level, based on the functionality of the device, and any mitigation requirements. Specifically, assistive technologies or medical devices that are found to pose a low risk can be approved for use in a SCIF without mitigation. However, if a device is found to have a higher risk, such as if a device contains a microphone or radio frequency transmitter or if the device has USB connectivity or flash memory, the guidance states that mitigations will need to be applied to reduce the risk to a low level before the device is permitted for use in a SCIF. According to the guidance, if the risk level cannot be lowered, the assistive technology or medical device may be prohibited from use in the SCIF.

ODNI's guidance states that each agency should evaluate and approve or deny assistive technologies and medical devices for use in SCIFs based upon the security risk they pose. However, the guidance does not describe how each agency should conduct these evaluations. As a result, each agency has its own process for evaluating these devices, and our selected agencies varied regarding approvals or denials of devices. For example:

- Officials at one agency stated that they maintain a list of over 4,000 approved assistive technologies and medical devices that is routinely updated. Employees can reference the list and see the approved devices. If employees want to request a device that is not on the approved list, they would submit a form and receive a determination regarding whether the device is approved for use in the SCIF or not.

- At a second agency, officials stated that they have formal guidance that assigns responsibilities and provides procedures for the introduction and use of, among other things, assistive technologies and medical devices within their facilities. This guidance also provides information on the specific capabilities that would prohibit a device from being used in a SCIF, such as cellular radio, Wi-Fi radio,

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[55]ODNI, IC Technical Specification, *Technical Specifications for Construction and Management of Sensitive Compartmented Information Facilities*, v. 1.5.1 (July 26, 2021). This document provides IC-wide guidance on the evaluation and approval process for portable electronic devices with recording capabilities and embedded technologies, including assistive technologies and medical devices.

Bluetooth radio, or media readers or removable media like USB thumb drives. According to the agency officials, devices that are approved for use in SCIFs are added to a standardized list of preapproved reasonable accommodation items that the agency maintains for their employees requesting a technology-related reasonable accommodation.

- Officials at a third agency stated that they do not have an approved list of devices for SCIFs. Instead, they evaluate assistive technologies and medical device requests on a case-by-case basis because they do not often receive requests. An employee would submit the device request to the Equal Employment and Opportunity office. Then, a reasonable accommodations coordinator would meet with the individual to learn more about the device being requested, and lastly, security would conduct a review of the device.

- At a fourth agency, officials based in the headquarters location stated that their security office has an approved list of devices, which includes things like hearing aids, glucose monitors, and heart monitors that they use to approve or deny requests. They also stated that security officers in the field offices are required to seek approval from a security office at headquarters for the use of electronic devices in SCIFs. However, agency officials in a field office location noted that they handle requests for assistive technologies and medical devices in the field independently of headquarters based upon their own security requirements. Those officials stated that they were not aware of a universal approved list of assistive technologies or medical devices in SCIFs. Additionally, according to agency officials, an employee may submit a request to the Reasonable Accommodation Program for review of any assistive technology or medical device. The Reasonable Accommodation Program would determine if the requested item is based upon a medical need and consult with security for use in the agency's SCIF.

Officials at some of the agencies we reviewed identified challenges with the lack of ODNI guidance specific to assistive technologies and medical devices, and have stated that they would like more guidance from ODNI. For example, officials at one agency stated that not having a framework in place for all IC elements to evaluate security risks for devices in the same way is a challenge and, as a result, each agency evaluates assistive technologies and medical devices differently. Additionally, officials from a second agency stated that ODNI has some existing guidance on assistive technology and medical devices that is shared through working groups and policy updates. However, they stated that more guidance would be

helpful for security teams who will increasingly need to handle accessibility issues due to the continuous evolution of technology.

Federal laws and regulations require federal agencies to ensure that employees with disabilities have comparable access to information and data and, if needed, those agencies must provide reasonable accommodations that allow these employees to perform their essential job functions. Specifically, Section 508 of the Rehabilitation Act of 1973, as amended, requires agencies to ensure that when developing, procuring, maintaining, or using electronic and information technology, unless an undue burden would be imposed on the agencies, that the technology allows, among other things, federal employees with disabilities to have access to and use of information and data that is comparable to the access to and use of the information and data by employees who are not people with disabilities.[56]

Additionally, IC Policy Guidance Number 110.1, which was issued in 2019 and provides guidance to the intelligence community for the employment of people with disabilities, states that IC elements shall endeavor to develop, procure, maintain, and use electronic and information technology systems that are accessible to people with disabilities, as described in Section 508 of the Rehabilitation Act.[57] Further, the guidance states that the IC Chief Information Officer will also promote the use of standard assistive technology to implement Section 508.

ODNI officials acknowledged the inconsistent procedures on reviewing and approving or denying assistive technologies and medical devices in SCIFs, and recognize that people with disabilities experience challenges with having consistent access to those devices. In addition, ODNI officials acknowledged that agencies face challenges with the variation between SCIFs, the reciprocity of assistive technologies and medical devices between agencies, and the rapidly evolving nature of technology.

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[56]Pub. L. No. 93-112, § 508 (1973) (codified, as amended, at 29 U.S.C. § 794d). Section 508 also includes an exemption from its requirements for national security systems. See 29 U.S.C. § 794d(a)(5). However, agency officials we met with stated they do not often use this exemption.

[57]ODNI, IC Policy Guidance 110.1, *Employment of Individuals with Disabilities* (Feb. 26, 2019).

In 2017, ODNI issued an interim policy to address wireless technology in the IC.[58] The policy established a steering committee to work on the issue of wireless technology and provided guidance for the IC on wireless technology until more comprehensive guidance could be issued. However, ODNI has not provided new guidance or updated its existing guidance since 2017. As a result, ODNI does not have guidance that addresses how federal agencies will address variation in SCIFs, reciprocity between federal agencies, and technology evolution as they relate to assistive technologies and medical devices in SCIFs.

ODNI officials told us that a working group comprised of officials from across the IC has been discussing the need for a SCIF medical device policy for years, and that ODNI has been in the process of drafting an IC-wide policy related to the use of medical devices in SCIFs.[59] The goal of the medical device policy, according to the officials, is to have more consistency across the IC for the process of evaluating assistive technologies and medical devices. However, ODNI officials were unable to provide a timeline for when the revised policies would be completed. ODNI officials stated that they were hopeful that a new policy will encourage reciprocity between IC elements. However, the officials noted that each facility addresses security risks differently and will need to make its own determinations on the approval or denial of devices for SCIFs. Additionally, according to a DOD official, the draft medical device policy does not address the inconsistencies between agencies or challenges, such as reciprocity, that agencies are experiencing with assistive technologies and medical devices.

Without new or updated guidance that includes consistent procedures for IC elements when evaluating assistive technologies and medical devices for use in SCIFs, people with disabilities may lack access to the devices they need to fully and appropriately perform their jobs in SCIFs. In addition, people with disabilities may not be able to participate in activities or career advancement opportunities outside of their home agency. Additionally, aging employees who acquire a disability might not be able to continue their service. As a result, federal agencies may not be able to

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[58]Director of National Intelligence Memorandum, *Wireless Technology in the Intelligence Community* (Jan. 19, 2017).

[59]ODNI officials stated that ODNI is also drafting a policy on the use of wireless technology.

attract or retain people with disabilities, which has been a priority for ODNI.

Conclusions

SCIFs are critical for storing, using, discussing, and processing the nation's most classified information. In managing those SCIFs, ODNI is responsible for managing and maintaining a database intended to inventory the more than 10,000 SCIFs across the federal government, but does not have complete information. Unless ODNI develops and implements a plan outlining steps for SCIF accreditors to report information to ODNI's database in a timely and comprehensive way, ODNI risks missing opportunities for more efficient use of resources across the IC through potential co-use agreements or identification of SCIFs for multiagency meetings.

Additionally, ODNI and the selected federal agencies have taken steps to improve physical access to SCIFs for people with disabilities, but barriers to physical access remain. ODNI's guidance provides limited information on ensuring needed access. Until ODNI updates existing guidance or issues new guidance that identifies minimum guidelines for addressing common physical access issues in SCIFs, and addresses accessibility in the annual SCIF security inspection process, federal agencies will not be able to ensure that SCIFs are physically accessible to the entirety of the workforce to the maximum extent practicable. Further, federal agencies could miss opportunities to strengthen the federal workforce by promoting diversity, equity, inclusion, and accessibility for people with disabilities. In addition, when workspaces in federal buildings, such as SCIFs, are inaccessible to people with disabilities, federal agencies may have difficulty gaining and retaining employees for whom access poses a unique challenge.

ODNI and selected federal agencies have taken steps to improve access to assistive technologies and medical devices in SCIFs for people with disabilities. However, challenges remain with providing access to these devices and ODNI has limited guidance to address those challenges. An update of existing guidance or new guidance on medical devices and assistive technologies is important for ensuring that employees have comparable access to information and data, and that people with disabilities can perform their essential job functions in SCIFs.

Specifically, ODNI does not have guidance for federal agencies that includes consistent procedures for the evaluation of medical devices and assistive technologies in SCIFs and addresses challenges such as variation in SCIFs, reciprocity between agencies, and technology evolution as it relates to assistive technologies and medical devices. Until ODNI updates its existing policy or issues a new policy, people with disabilities may not have access to the devices they need to perform their essential job functions, and ODNI may not be able to attract or retain people with disabilities.

Recommendations for Executive Action

We are making the following four recommendations to ODNI.

The Director of National Intelligence should ensure that the Director of the National Counterintelligence and Security Center, in collaboration with each of the SCIF accrediting agencies, develops and implements a plan outlining steps for SCIF accrediting agencies to report data on their inventory of SCIFs in a timely manner in accordance with ICD 705. (Recommendation 1)

The Director of National Intelligence, in coordination with the IC element heads, should issue updated or new guidance that identifies minimum specifications for common accessibility concerns at entrances and within SCIFs, including automatic door openers, accessible door locks and intrusion detection systems, and tactile signage. (Recommendation 2)

The Director of National Intelligence, in coordination with the IC element heads, should issue updated or new guidance that addresses accessibility in the annual SCIF security inspection process. This process could include an accessibility checklist to all federal agencies to identify and address—to the maximum practicable—physical access barriers to and inside SCIFs. (Recommendation 3)
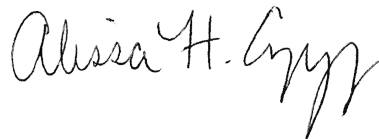
The Director of National Intelligence, in coordination with the IC element heads, should issue updated or new guidance that includes consistent procedures for IC elements to follow when evaluating assistive technologies or medical devices for use in SCIFs. At a minimum, that guidance should identify how federal agencies should address variation in SCIFs, reciprocity between agencies, and technology evolution as it relates to assistive technologies and medical devices. (Recommendation 4)

Agency Comments

We provided a draft of our sensitive report to ODNI, the Department of Defense, and all of the other federal agencies in the scope of this report. For our sensitive report, ODNI did not provide information on whether it concurred with our recommendations, but provided technical comments. In its technical comments, ODNI expressed concern with some of the language in our recommendations, which we adjusted as appropriate. Four additional agencies also provided technical comments on the sensitive report, which we incorporated as appropriate. Since the recommendations in this report are the same as those in the sensitive report, we did not seek additional DOD or other federal agency comments for this public version of the report.

We are sending copies of this report to the appropriate congressional committees, the Director of National Intelligence, the Secretary of Defense, and other interested parties. In addition, the report is available at no charge on the GAO website at https://www.gao.gov.

If you or your staff has any questions about this report, please contact me at (202) 512-3058 or CzyzA@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix II.

Alissa H. Czyz
Director, Defense Capabilities and Management

Appendix I: Objectives, Scope, and Methodology

We were asked to review federal agencies' efforts to manage SCIFs, including how ODNI and federal agencies inventory those facilities and ensure access for people with disabilities. This report is a public version of a sensitive report that we issued on September 26, 2023.[1] This report evaluates the extent to which (1) ODNI maintains a complete database of SCIFs at federal agencies, (2) selected federal agencies provide physical access to SCIFs for people with disabilities, and (3) selected federal agencies provide access to assistive technologies or medical devices for use in SCIFs.

Further, this public report omits certain information that ODNI deemed to be sensitive (i.e., For Official Use Only), which could reasonably be expected to cause a foreseeable harm to the U.S. government or other interest protected by law, if disclosed. Therefore, this report omits sensitive information on the identification of the federal agencies that conduct SCIF accreditations and our analysis comparing data in ODNI's database to data maintained by the SCIF accreditors. The report also omits attribution to specific federal agencies in examples cited throughout the report. Although the information provided in this report is more limited, the report addresses the same objectives as the sensitive report and uses the same methodology.

For objective one, we reviewed Intelligence Community (IC)-wide and agency-specific policies and guidance related to SCIF management and SCIF design, construction, and accreditation. We also obtained and reviewed information from ODNI's government-wide SCIF database, as well as databases managed by each of the federal agencies responsible for accrediting SCIFs. To assess the reliability of ODNI's SCIF data, we interviewed knowledgeable officials, reviewed relevant documentation, and compared ODNI's data to data from the SCIF accreditors.[2] We

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[1]GAO, *Federal Real Property: Improved Data and Access Needed for Employees with Disabilities Using Secure Facilities*, GAO-23-106120SU (Washington, D.C.: Sept. 26, 2023) (FOUO).

[2]We did not assess the data reliability steps taken by the SCIF accreditors to maintain their respective databases. We focused on the processes and procedures ODNI uses to ensure its database is accurate and complete.

describe limitations in the report, but determined that an overall minimum
number of SCIFs could be reported to provide an indication of the
magnitude of ODNI's inventory.

We compared information captured in those various databases to ODNI's
IC guidance to determine whether ODNI was appropriately managing and
maintaining a complete inventory of information on SCIFs across the
federal government. We also considered relevant federal internal control
standards related to the use of quality information.[3] We determined that
the information and communication component of internal controls was
significant to this objective, along with the underlying principle that
management should use quality information to achieve objectives. We
also interviewed officials from ODNI and each of the SCIF accreditors
knowledgeable about reporting SCIFs to ODNI's database.

For objective two, we reviewed relevant statutes and executive orders
related to accessibility at federal agencies, such as how agencies identify
barriers and address accessibility for people with disabilities in federal
facilities.[4] We also reviewed ODNI's IC-wide and federal agency-specific
guidance related to SCIF accessibility to determine whether people with
disabilities broadly have access to SCIFs. We selected 10 federal
agencies representing a range of national security missions and uses of
SCIFs for a mix of facility visits and interviews.[5]

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[3]GAO, S*tandards for Internal Control in the Federal Government*, GAO-14-704G
(Washington, D.C., September 2014).

[4]Specifically, we reviewed the following statutes: Architectural Barriers Act of 1968, Pub.
L. No. 90-480 (1968) (codified, as amended, at 42 U.S.C. §§ 4151 et seq.); Americans
with Disabilities Act of 1990, Pub. L. No. 101-336 (1990) (codified, as amended, at 42
U.S.C. §§ 12101 et seq.); and Rehabilitation Act of 1973, Pub. L. No. 93-112, §§ 501, 508
(1973) (codified, as amended, at 29 U.S.C. §§ 791, 794d). We also reviewed Exec. Order
No. 14,035, *Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*, 86
Fed. Reg. 34,593 (June 25, 2021).

[5]The federal agencies we selected are the Central Intelligence Agency, Defense
Intelligence Agency, Department of Homeland Security, Department of Justice, Drug
Enforcement Administration, Federal Bureau of Investigation, National Geospatial-
Intelligence Agency, National Reconnaissance Office, National Security Agency, and the
Office of the Director of National Intelligence.

We selected and visited a non-generalizable sample of 22 SCIFs at nine facilities.[6] We selected SCIFs at these federal agencies and locations to have a relative mix of (a) headquarters and field locations, (b) SCIFs accredited and managed by the same federal agency, and those by different federal agencies, (c) SCIF types and uses, and (d) Department of Defense and other federal agencies. On those visits, we obtained physical evidence regarding the application of accessibility policies in SCIFs, observed barriers, if any, to accessibility in SCIFs and steps taken to address them, and interviewed officials responsible for managing the SCIF.

We also interviewed officials in charge of addressing accessibility at their organizations and members of disability affinity networks, where available, at the 10 federal agencies to obtain their perspective on ways to improve physical access to SCIFs, methods for leveraging the ODNI guidance to improve access to SCIFs, and common issues they encountered regarding physical access to SCIFs. We compared our findings from the documentation, interviews, and site visits to relevant federal statutes and ODNI guidance to determine how ODNI and the selected agencies were addressing physical access to workspaces, including SCIFs.

For objective three, we reviewed relevant statutes, executive orders, and IC-wide and agency-specific guidance and documentation related to assistive technologies and medical devices and the reasonable accommodations process to determine whether agencies were providing these technologies and devices in SCIFs. We used the non-generalizable sample of 10 federal agencies referenced above, including physical visits to SCIFs and interviews with accessibility officials and disability affinity groups, to determine how selected agencies were evaluating and using medical devices and assistive technologies in SCIFs.

We also interviewed officials about accessibility standards for SCIFs; the reasonable accommodation process; and medical device and assistive technologies policies and practices from ODNI and the 12 agencies responsible for accrediting SCIFs. Additionally, we interviewed DOD officials at the Computer-Electronic/Accommodations Program (CAP) office. We compared results from our interviews, document reviews, and

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[6]We selected the 22 SCIFs from five of the 10 federal agencies in our sample. This included SCIFs accredited and owned by federal agencies in the Washington D.C. and Atlanta regions, as well as SCIFs accredited by one agency but owned by another agency in both locations.

site visits for each selected agency with the relevant federal laws and regulations and ODNI guidance to determine how selected agencies were evaluating and approving or denying medical devices and assistive technologies for use in SCIFs.

We conducted this performance audit from June 2022 to January 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: GAO Contacts and Staff Acknowledgments

GAO Contact

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Staff Acknowledgments

In addition to the contact above, Kristy Williams (Assistant Director); Scott Bruckner (Analyst in Charge), Michele Fejfar, Peggie Garcia, David L. Jones, Emily Martin, Richard Powelson, Ben Schaefer, and Carter Stevens made key contributions to this report.

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