



Sensitive Compartmented Information Facilities ADA – Compliant Component

Energy, Installations and Environment

A Briefing to the
Committee on Armed Services
U.S. House of Representatives

On how the Department of Defense is applying
Architectural Barriers Act (ABA) 404.2.9 in its
construction and lease of space for Sensitive
Compartmented Information Facilities

July 2023

The estimated cost of this report or study for the Department of Defense is approximately \$1,950 for the 2023 Fiscal Year. This includes \$200 in expenses and \$1,750 in DoD labor.

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Congressional Request

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House Report 117-397, page 267, accompanying H.R. 7900, the National Defense Authorization Act for Fiscal Year 2023, requests DoD to review and brief the House Committee on Armed Services by March 1, 2023, on:

1. How it is applying ABA 404.2.9 in its construction design and lease requirements.
2. Any obstacles or impediments to ensuring secure doors otherwise comply with ADA and ABA safety requirements, and,
3. How DoD plans to source equipment to ensure compliance with applicable safety regulations.



Architectural Barrier Act 404.2.9

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Opening Force [§404.2.9]

- Requires 5-pound force (lbf) maximum opening force for all accessible doors and gates except:
 - exterior hinged doors (no maximum specified)
 - latch bolts and other devices that keep doors or gates closed
- The 5 lbf maximum applies to the continuous application of force necessary to fully open a door, not the initial force needed to overcome the door's seal resulting from unequal pressure.
- Latch bolts must be retracted and other devices that keep doors or gates closed must be disengaged prior to measuring the opening force.
- ABA requirements can be waived, however, there are no waivers in place for SCIF doors.



DoD Application of ABA 404.2.9

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DoD applies ABA 404.2.9. adherence through statute, policy, guidance, and design specifications.

- Section 4152 of title 42 U.S.C., requires the standards for design, construction, and alteration of buildings; to ensure whenever possible that physically handicapped persons will have ready access to and use of, such buildings.
- Deputy Secretary of Defense policy memo dated October 31, 2008, “Access for People with Disabilities” – adopts ABA Chapters 1 and 2 and Chapters 3 through 10 as DoD standards. The provisions of this policy memo apply to all administrative facilities, and any other facilities where civilian workers may be employed, including facilities constructed under other than military construction authorizations, leased facilities and including contractor-owned facilities where DoD is funding all or part of the construction.
- Unified Facilities Criteria (UFC) 1-200-01, “DoD Building Code,” Feb. 24, 2023 – Chapter 11 states, “Use the ABA Standards and the special provisions of the DoD Deputy Secretary of Defense Memorandum, Subject: Access for People with Disabilities, October 31, 2008.
- Unified Facilities Criteria (UFC) 4-010-05, “Sensitive Compartmented Information Facilities Planning, Design, and Construction,” Oct. 1, 2013 – Chapter 1, paragraph 1-8, directs designers to use UFC 1-200-01 in addition to 4-010-05 for accessibility design requirements.



DoD Application of ABA 404.2.9

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Specifications:

- **Intelligence Community Tech Spec for ICD/ICS 705, “Technical Specifications for Construction and Management of Sensitive Compartmented Information Facilities”**, July 26, 2021.

Chapter 3, E. **SCIF Door Criteria**

Paragraph 5. a) “All SCIF perimeter doors shall comply with applicable building codes, safety, and accessibility requirements as determined by the Authority Having Jurisdiction.”

Paragraph 5. c) “All SCIF perimeter doors shall be equipped with an automatic, non-hold door-closer which shall be installed internal to the SCIF.”

- **GSA Federal Specification FF-L-2890** details requirements for locking hardware on SCIF doors. Beginning with the 2012 edition, locks on normally occupied rooms have been required to comply with model codes including ADA Standards for Accessible Design.



Obstacles or Impediments

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- The majority of SCIF doors exceed a 5 lbf pull due primarily to their weight and hardware imposed by security requirements.
- Prior to 2021 there were no GSA approved automatic bolt retraction solutions on the market for SCIF doors.
- GSA recently approved two automatic bolt retraction locks that meet the ABA access requirements. When these new locks are paired with an automatic door operator, the doors will meet ABA door standards, i.e., eliminates the concern of a 5 lbf or more door pull.
 - Sargent and Greenleaf lock approved February 1, 2021
 - Lockmasters lock approved December 8, 2022



Plans to source equipment to ensure compliance

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- For new construction, DoD will reinforce with DoD Components the ABA requirement and availability of a viable solution.
- For existing SCIF doors in owned or leased facilities that are not ABA compliant, DoD will replace them with compliant doors and hardware when existing doors become inoperable or to enable access by personnel with disabilities.
- DoD will also determine if added emphasis on ABA is needed in its Unified Facilities Guide Specification.