



# **Cybersecurity & Infrastructure Security Agency Disability Access Plan**

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Cybersecurity and Infrastructure Security Agency

## Summary of Changes

Section Reference	Type of Change	Concise Description	Sponsor	Author and Approving Authority (Name, Office/Division)	Date of Approval

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## Introduction

On September 25, 2013, the Department of Homeland Security (DHS) Under Secretary for Management issued Directive 065-01, “Nondiscrimination for Individuals With Disabilities in DHS-Conducted Programs and Activities (Non-Employment),” and subsequently the accompanying Instruction, 065-01-001. Among other things, the directive requires each DHS component to (1) designate a lead Disability Access Coordinator (DAC), (2) conduct a self-evaluation of its programs and activities to identify barriers and gaps in ensuring access for individuals with disabilities, and (3) develop a Component Plan to address the results of the self-evaluation. In fiscal year (FY) 2024, the Cybersecurity and Infrastructure Security Agency (CISA) appointed a DAC, conducted a self-evaluation, and began to take immediate steps to address barriers and gaps that were identified. This document serves as CISA’s Disability Access Plan (DAP).

## Purpose

The purpose of this Plan is to identify short-, mid-, and long-range goals and provide guidance to strengthen nondiscrimination for individuals with disabilities encountered and served<sup>1</sup> by CISA pursuant to Section 504 of the Rehabilitation Act of 1973, as amended.<sup>2</sup>

## Executive Summary

CISA completed its self-evaluation pursuant to DHS Directive 065-01 and its accompanying Instruction 065-01-001 between October and December of 2023. CISA used the self-evaluation tool contained within the “Component Self-Evaluation and Planning Reference Guide” to compile an inventory of all public-facing activities. The results indicate that many CISA programs, offices, and staff follow effective practices to ensure public access for individuals with disabilities. However, CISA needs agencywide policies, procedures, guidance, and communications for the many facets of ensuring accessibility for individuals with disabilities in the non-employment context.

Regarding gaps in programmatic accessibility, the self-evaluation identified the need to develop a standardized reasonable modification process to address the accessibility needs of members of the public with disabilities. In the area of effective communication, the self-evaluation identified the need for CISA to develop written, consistent guidance for processes, practices, and resources (e.g., public requests for reasonable modifications, accessible “taglines” on all products, and ensuring accessibility of electronic communications). Regarding physical accessibility, the self-evaluation noted that while

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1. CISA employment related accessibility is covered under separate DHS policy and procedure. Questions about employment related accessibility and reasonable accommodations may be referred to [CISA\\_ReasonableAccommodation@cisa.dhs.gov](mailto:CISA_ReasonableAccommodation@cisa.dhs.gov).

2. Codified in 29 United States Code 794, “Nondiscrimination Under Federal Grants and Programs.”

CISA facilities comply with the Architectural Barriers Act Accessibility Standards,<sup>3</sup> physical access challenges may exist with heavy doors and automatic door openers not working.<sup>4</sup>

CISA has used the results of the self-evaluation as a basis for laying the framework for improvement in the provision of accessibility through the initial development of a draft “Reasonable Modification Policy for Conducted Programs and Activities” and three internal Factsheets on “Disability Access,” “Reasonable Modifications,” and “Ensuring Accessible Events.”

## Scope

CISA’s commitment to disability access includes programs and activities directly conducted by CISA and those conducted by its contractors. The CISA DAP focuses on enhancing the accessibility of CISA services and resources for the public and external stakeholders.<sup>5</sup>

## Key Terms

The following are terms associated with the goals of the CISA DAP and its implementation. Note that these definitions should not be read to be inconsistent with statute or the DHS Section 504 regulation (6 CFR Part 15, “Enforcement of Nondiscrimination on the Basis of Disability in Programs or Activities Conducted by the Department of Homeland Security”).

- **Auxiliary Aids and Services:** Services or devices that enable qualified individuals with disabilities to have an equal opportunity to participate in, and enjoy the benefits of, programs or activities conducted by CISA. Auxiliary aids and services include, but are not limited to:
  - Qualified interpreters on-site or through video remote interpreting services; note takers; real-time computer-aided transcription services; written materials; exchange of written notes; telephone handset amplifiers; assistive listening devices; assistive listening systems; telephones compatible with hearing aids; closed caption decoders; open and closed captioning, including real-time captioning; voice, text, and video-based telecommunications products and systems, including text telephones, videophones, and captioned telephones, or equally effective telecommunications devices; videotext displays; accessible electronic and information technology; or other effective methods of making orally delivered information available to individuals who are deaf or hard of hearing;
  - Qualified readers, taped texts, audio recordings, braille materials and displays, screen reader software, magnification software, optical readers, secondary auditory programs, large print materials, accessible electronic and information technology, or other effective methods of making visually delivered materials available to individuals who are blind or have low vision;

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3. The Architectural Barriers Act Accessibility Standards apply to GSA-leased facilities and ensure that all GSA buildings and facilities are accessible to persons with disabilities.

4. CISA notes that facilities occupied by CISA are not CISA’s facilities, they are GSA-leased or owned facilities, which can impact CISA’s ability to resolve physical access issues.

5. This Plan does not cover employment-related accessibility, which is also essential, but is covered under separate DHS policy and procedure.

- Acquisition or modification of equipment or devices; and
- Other similar services and actions.
- **Conducted Programs and Activities:** All CISA programs and activities, including those carried out through contractual or licensing arrangements, with the exception of programs and activities conducted outside the United States that do not involve an individual with a disability in the United States.
- **Disability:** With respect to an individual, means a physical or mental impairment that substantially limits one or more major life activities (an “actual disability”), or a record of a physical or mental impairment that substantially limits a major life activity (“record of”), or an actual or perceived impairment, whether or not the impairment limits or is perceived to limit a major life activity, that is not both transitory and minor (“regarded as”).
- **Effective Communication:** Communication that considers the nature, length, complexity, and context of communication and ensures a person with a vision, hearing, speech, or processing disability can communicate with, receive information from, and convey information to CISA. DHS policy is to give primary consideration to the auxiliary aid requested by the individual with the disability.
- **Interactive Process:** The process by which the individual with a disability requesting a modification and CISA engage with each other about the modification request, the process for determining whether a modification can be provided, and identification of alternative modifications.<sup>6</sup>
- **Interpretation and Translation:** Interpretation involves the immediate spoken/signed communication of meaning from one language into another. Translation involves written communication. Interpretation is a complex task that combines several abilities beyond language competence to enable delivery of an effective professional interpretation in each setting, requiring skills different from those needed for translation. From the standpoint of the user, a successful interpretation is one that faithfully and accurately conveys the meaning of the source language, reflecting the style, register, dialect, and cultural context of the source message, without omissions, additions, or embellishments on the part of the interpreter.
- **Major Life Activities:** Basic activities that the average person in the general population can perform with little or no difficulty, such as (but not limited to) caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, concentrating, thinking, interacting with others, and working. A major life activity can also include the operation of a major bodily function.
- **Qualified Individual With a Disability:** An individual who can meet the essential eligibility requirements for receipt of services or participation in CISA programs, activities, or services with or without (1) reasonable modifications to CISA’s rules, policies, or practices; (2) removal of architectural, communication, or transportation barriers; or (3) provision of auxiliary aids and services.

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6. DHS Instruction 065-01-001, Section IV.I.

- **Reasonable Modification:** A change or modification in a policy, practice, or procedure that would enable a qualified individual with a disability to participate in, and benefit from, a program or activity. CISA may request advance notice from individuals for modifications and auxiliary aids that require planning or procurement, such as sign language interpreters. Excessive advance notice requirements should not be imposed. Additionally, on-the-spot requests for modifications, aids, and services should also be honored to the extent possible.
- **Section 504:** Section 504 of the Rehabilitation Act of 1973 (29 United States Code 794, “Nondiscrimination Under Federal Grants and Programs”), as amended. A federal law that prohibits discrimination based on disability in federally assisted and federally conducted programs or activities in the United States. As used in this Plan, Section 504 applies to programs or activities conducted by CISA, including through its contractors.
- **Undue Burdens:** Financial and administrative burdens that entail significant difficulty or expense after considering all CISA resources available for use in the funding and operation of the CISA-conducted program or activity.

## Policy

All CISA employees are responsible for complying with DHS policy and providing any necessary modifications to allow individuals with a disability to have full access to a program or activity. When receiving a reasonable modification request from the public or external stakeholders, divisions and mission enabling offices (offices) should consult the CISA Office of Privacy, Access, Civil Liberties, and Transparency (PACT) for advice on how to ensure policy compliance.

DHS policy is to provide any necessary modifications to afford a qualified individual with a disability full enjoyment of the program or activity, unless modifications of policies, practices, or procedures would fundamentally alter the nature of the program, service, or activity.

## Component Plan to Address Barriers and Gaps

### Responsible Staff

The CISA DAC is the Associate Chief for External Civil Rights and Civil Liberties, PACT, supported by the CISA Language Access Coordinator, PACT. The supporting DACs are the Section 508 and Accessible Technology Program Manager, Office of the Chief Information Officer, and the Associate Chief for Access and Equity-Reasonable Accommodation, Office of Equity, Diversity, Inclusion, and Accessibility.

The DAC, or their delegate, will be responsible for assessing CISA's disability access and support needs, leveraging agencywide best practices to enhance and update the Disability Access Plan, coordinating across CISA to implement the plan, monitoring implementation, and ensuring compliance with law and policy. The DAC, or their delegate, will also participate in the DHS Disability Access Working Group and lead the CISA Disability Access Working Group.

As of 2024, this function is not fully resourced with a full-time employee designated solely to disability access. Comprehensive implementation of this Plan is highly dependent on adequate resourcing that CISA has requested.

## CISA Overview

CISA is the operational lead for federal cybersecurity and the national coordinator for critical infrastructure security and resilience. CISA works with partners to defend against today's threats and collaborates to build a more secure and resilient infrastructure for the future. The CISA mission is to lead the national effort to understand, manage, and reduce risk to our cyber and physical infrastructure. Detailed information about CISA is available on the [CISA website](#).

## Program Interactions

During the initial stages of the self-evaluation, the CISA DAC requested that all CISA divisions and offices provide examples of public-facing programs and activities they are involved in or responsible for. CISA does not maintain physical locations for the public to “walk into” and interact with CISA. CISA interacts with the public as it implements its programs and activities through its website, events, publications, educational campaigns, and other types of service delivery. Some examples are:

- [Free Cybersecurity Services and Tools](#)
- [Election Security: #Protect2024](#)
- [Secure Our World: Online Threats Campaign](#)
- [Shields Up: Cybersecurity Campaign](#)

CISA also interacts regularly with critical infrastructure owners, operators, and partners, such as state, local, tribal, and territorial agencies, non-government and not-for-profit groups. CISA connects stakeholders in industry and government to each other and to resources, analyses, and tools to help them build their own cyber, communications, and physical security and resilience, in turn helping to ensure a secure and resilient infrastructure for the American people.

## Addressing Existing Policy Gaps and Barriers

DHS Directive 065-01 established a policy that affirms DHS's commitment to the nondiscrimination obligations of Section 504. These obligations apply to all CISA-conducted programs and activities:

- CISA policy is to ensure nondiscrimination based on disability in its conducted programs and activities, and for CISA to provide equal opportunity for qualified individuals with disabilities served or encountered in its conducted programs and activities, through:
  - Program accessibility, including by providing equal opportunity to access programs, services, and activities, and delivering these in the most integrated setting appropriate to the individual's needs;
  - Physical access, including by providing accessible new construction and alterations in accordance with the Architectural Barriers Act of 1968 (as amended) and DHS's Section 504 regulation; and
  - Effective communication, including by providing auxiliary aids and services for



persons who are deaf, hard of hearing, blind, or have low vision, and by modifying practices and materials to ensure effective communications with persons with intellectual or developmental disabilities.

- CISA policy is to specifically consider the auxiliary aid and/or modification requested by the individual with the disability and provide any necessary reasonable modifications to afford a qualified individual with a disability full enjoyment of the program or activity (unless modifications of policies, practices, or procedures would fundamentally alter the nature of the program, service, or activity).
- CISA policy is to engage in an interactive and individualized process to identify reasonable modifications. In ensuring effective communication with individuals with disabilities, CISA's policy is to give primary consideration to the auxiliary aid requested by the individual with the disability.

For more information about the nondiscrimination obligations of Section 504 and about DHS Directive 065-01, please visit the [webpage for disability access at DHS](#).

### **Program Accessibility**

Listed below are the CISA methods to improve access to programs and activities for individuals with disabilities in the most integrated setting appropriate:

- Conduct an inventory of CISA-leased locations, including information on automatic door openers at entrance/exit doors and restrooms, and maintain a status listing to determine optimal locations to conduct meetings based on the disability access features;
- Assess registration processes for CISA-sponsored events and trainings, and other means for persons with disabilities to self-identify and request a modification to participate, consistent with the event or training format;
- Review how requests were addressed to ensure the accessibility of the event or training as part of its planned format; and
- Ensure CISA staff are properly trained on effective interaction with people who have disabilities.

### **Interaction Procedures/Protocols**

Listed below is the CISA process for modifying existing or developing new procedures or protocols to improve access for individuals with disabilities encountered or served by CISA:

- Issue a factsheet to CISA employees on how to conduct accessible meetings along with resources such as "[A Guide to Interacting with People Who Have Disabilities](#)" issued by the Office for Civil Rights and Civil Liberties (CRCL); and
- Train CISA staff periodically about compliance with Section 504 in publicly conducted activities and programs.

## **Reasonable Modification of Policies and Procedures**

Listed below is CISA's plan to modify existing and develop new policies and procedures for providing reasonable modifications to qualified individuals with disabilities.

- Develop a "Reasonable Modification Policy for Conducted Programs and Activities," that will outline the steps to take upon receipt of requests for reasonable modifications from individuals with disabilities. This new policy will include:
  - An introduction and overview of CISA's obligation under Section 504 to ensure equal access to public-facing programs and activities for individuals with disabilities;
  - Information on the interactive process and how it relates to the provision of reasonable modifications;
  - A description of the process to be followed when a request for a reasonable modification is received;
  - Identification of key staff who will assist in providing reasonable modifications; and
  - A method of tracking all requests for reasonable modifications received and how each request was handled.

While the CISA-specific "Reasonable Modification Policy for Conducted Programs and Activities" is being developed, CISA will develop informal internal guidance for CISA personnel on processes to receive reasonable modification requests from members of the public and how to coordinate through the CISA DAC to provide reasonable modifications. CISA will continue to provide reasonable modifications in accordance with law and DHS policy.

## **Auxiliary Aids and Services Policies/Procedures**

Listed below is CISA's plan for developing new policies and procedures to furnish auxiliary aids and services to ensure effective communication for qualified individuals with disabilities.

- Develop of a new factsheet: "Ensuring Accessible Events." This factsheet will:
  - Provide descriptions of various types of auxiliary aids and services;
  - Contain specific steps to obtain each of these auxiliary aids and services; and
  - List points of contact who may be of assistance in providing auxiliary aids and services.

## **Dissemination of Policies and Procedures**

The CISA DAC will make this Plan, resources related to DHS Directive 065-01, and the link to the DHS Disability Access website hosted by CRCL more readily available to CISA personnel who interact with or provide information to the public in support of CISA programs and activities. Distribution methods may include, but are not limited to:

- Onboarding materials;
- Internal websites used by CISA employees; and

- Internal communications to employees such as periodic email reminders.

In addition, upon completion and approval of CISA's "Reasonable Modification Policy for Conducted Programs and Activities," CISA will distribute the policy and CRCL's "A Guide to Interacting With People who Have Disabilities" electronically to staff for use and guidance.

### **Training**

CISA will take the following steps to provide training to managerial and program staff on disability access responsibilities:

- The CISA DAC, with assistance from the supporting DACs as needed, will provide training to CISA staff using the methods described below.
  - For all new staff, including contractors and interns, CISA will provide training and/or orientation on CISA's Section 504 obligations related to program, physical, and communication access.
  - CISA will provide training to staff on a recurring basis and distribute tools and factsheets. This training will also include training on the use of auxiliary aids and services as necessary.

### **Notification to the Public**

CISA will take the following steps to provide and/or improve how it provides notice to key stakeholders and members of the public of their rights under Section 504 and how to file a complete complaint under Section 504:

- Include the tagline: "If you require a reasonable modification or a disability-related aid or service, please contact [POC] no later than [date]." in all CISA meeting or teleconference invitations and other electronic newsletters and distributions; and
- Ensure CISA websites-- internal and public facing-- provide information regarding an individual's rights under Section 504, how to request reasonable modifications, and how to file a Section 504 complaint.

### **Resources**

CISA is committed to providing the resources necessary to ensure compliance with Section 504 and implement this Plan with respect to individuals with disabilities who CISA encounters and serves. CISA has resources in place to provide reasonable modifications and auxiliary aids and services as requested by members of the public with disabilities. As noted above, CISA policy is to provide any necessary modifications to afford a qualified individual with a disability full enjoyment of the program or activity, unless modifications of policies, practices, or procedures would fundamentally alter the nature of the program, service, or activity, or result in undue financial and administrative burdens to CISA.

## Implementation Steps

### Immediate Actions to Address Policy Gaps and Barriers Following CISA's Self-Evaluation

To address the results of its self-evaluation, CISA promptly took several immediate actions to improve access to CISA programs and activities while also beginning work on its agency plan, including but not limited to:

- Drafted a new factsheet: “Disability Access.” This guidance provides basic information for all CISA staff on DHS Directive 065-01 and its accompanying DHS Instruction 065-01-001;
- Drafted a new factsheet: “Ensuring Accessible Events.” This guidance provides instructions and tips for staff on ensuring that all meetings and events conducted by CISA are accessible to stakeholders with disabilities; and
- Developed and published a new factsheet: “Reasonable Modifications.” This guidance provides instructions and tips for staff on processes and points of contact to consult when members of the public request reasonable modifications to access CISA programs or activities.

### Timeframes, Milestones, and Responsible Parties Associated With the Steps CISA Will Take in Implementing the Remaining Action Items Described in This Plan

#### Policy Barriers

- Develop a “Reasonable Modification Policy for Conducted Programs and Activities.”
  - Responsible Staff: The CISA DAC, in coordination with supporting DACs and the CISA Office of Strategy, Policy, and Plans
  - Timeline: **FY 2026**
- Ensure acquisition/contracts include language requiring contracted entities to comply with external-facing disability access requirements.
  - Responsible staff: The CISA DAC, with support from the CISA Office of the Chief Acquisition Executive (OCAE)
  - Timeline: **FY 2026**

#### Program Accessibility

- Stand up a Disability Access “External-Facing” Working Group and identify points of contact in CISA offices with public-facing programs and activities to serve on this group.
  - Responsible staff: The CISA DAC
  - Timeline: **FY 2025**
- Develop and include a tagline on all external CISA program and activity products to ensure accessibility for stakeholders and members of the public.

- Responsible staff: The CISA DAC
- Status: **Underway**

### Dissemination of Policies and Procedures

Upon completion of the development of key documents noted in this Plan and upon approval, the CISA DAC, with support from the CISA Office of External Affairs (EA), will provide the following policies, procedures, and guidance to staff electronically and in hard copy, as needed:

- CISA factsheets: “Disability Access,” “Ensuring Accessible Events,” and “Reasonable Modifications”
  - Responsible staff: The CISA DAC, with support from CISA EA
  - Timeline: Development, dissemination, and training to be completed by FY 2025
- CISA’s “Plan for Improving Access to Public-Facing Programs and Activities for Individuals with Disabilities”
  - Responsible staff: The CISA DAC, with support from CISA EA
  - Timeline: Development, dissemination, and training to be completed by FY 2025
- CISA’s “Reasonable Modification Policy for Conducted Programs and Activities”
  - Responsible staff: The CISA DAC, with support from CISA EA
  - Timeline: Development, dissemination, and training to be completed by FY 2026

### Training

- The CISA DAC, with support from the supporting DACs, will promote training on conducting accessible meetings for CISA staff.
  - Responsible staff: The CISA DAC, with support from the supporting DACs
  - Timeline: Training to be completed by FY 2026
- The CISA DAC, with support from the supporting DACs, and the CISA OCAE will discuss appropriate contract language regarding Section 504 obligations, as well as training of contract personnel.
  - Responsible staff: The CISA DAC, with support from the supporting DACs
  - Timeline: Training to be completed by FY 2026

### Notification to Public

- Begin use of a tagline for all external CISA programs and activities to ensure accessibility for stakeholders and members of the public.
  - Responsible staff: All CISA divisions and offices with support from the CISA DAC
  - Timeline: Notification actions to be completed by FY 2025
- Post information on the CISA public webpage about individual rights under Section 504, how to request reasonable modifications, and how to file a complete complaint

under Section 504.

- Responsible staff: The CISA DAC, with support from the supporting DACs and EA
- Timeline: Notification actions to be completed by FY 2025
- Post information on the CISA public webpage (and any corresponding websites for CISA regional offices) on how to request CISA materials in alternate formats, or more generally, how to request auxiliary aids and services.
  - Responsible staff: The CISA DAC, with support from the supporting DACs and EA
  - Timeline: Notification actions to be completed by FY 2025

## Appendix A: Examples of CISA Public-Facing Programs and Activities

- Communication with the public through events involving members of the public and/or CISA partners, such as meetings and community engagement activities
- Communication with the public through virtual means: website, phone, and email
- Public-facing resources and tools on [cisa.gov](https://www.cisa.gov): infographics, videos, guides, forms, and publications
- Outreach/Training
  - Verbal presentations
  - Written presentations
  - Handouts
- Freedom of Information Act Requests/Privacy Act Requests
  - Telephone
  - Website information and forms
  - Responsive contacts – calls, letters, and emails
- CISA web content on [DHS.gov](https://www.dhs.gov)
- CISA personnel participating as speakers in conferences, roundtables, and other events that interface with the public