

ODNI Equity Action Plan

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Format:	Microsoft Word Document, 12 pt. font, normal margins
Release:	This document, per Executive Order (EO) 13985, contains the ODNI Equity Action Plan which meaningfully addresses the barriers and opportunities identified through the agency's equity assessment. The Plan will be used to help set public expectations and promote accountability, and inform the agency's longer-term equity planning and implementation strategy.

(1) EXECUTIVE SUMMARY

The Office of the Director of National Intelligence (ODNI) integrates the activities of the Intelligence Community (IC) and produces strategic analysis for policymakers, which serves as the basis for senior-level deliberations and policy development. ODNI also establishes IC guidelines and policy standards for contracting investments that promote equitable procurement and acquisition by the IC. As part of our commitment to EO 13985, we are redoubling efforts to act transparently with the public and to act in objective and unbiased ways as we execute our mission.

Our Action Plan provides detail on how several major initiatives will help us use our public-facing programs, policies, and tools to advance fairness and opportunity and promote equitable delivery of government benefits. In priority order they are:

1. **Expanding SCIF-as-a-Service (SaaS)** – The IC, in partnership with industry, will seek to enable the historically underserved by providing SCIF space along with network availability for conducting research and responding to classified solicitations. Such access to accredited SCI facilities includes furnished units with classified computers.
2. **Leveraging the Intelligence Science and Technology Partnership (In-STeP)** – This initiative is designed to inform the IC's science and technology investment decisions by including a broad range of diverse inputs potentially leading to contract awards from geographically diverse companies, women-owned small businesses, and Historically Underutilized Business Zones.
3. **Enhancing Trade Association Partners (TAP) Engagements** – TAP will advance equity and inclusion within stakeholder engagement by connecting ODNI with industries relevant to advancing the intelligence mission and U.S. National Security.
4. **Identifying and Mitigating Intelligence Officer Bias on Issues of Equity** – We will use this initiative to define, identify, evaluate, and mitigate potential equity-related bias in IC production.
5. **Advancing Civil Rights** – We will improve communications in regard to employees' and applicants' rights under Section 508 of the Rehabilitation Act and the Architectural Barriers Act. In addition we will post Part J of the MD-715 (the ODNI's Affirmative Employment Plan) on the ODNI public-facing webpage.

(2) SUMMARY OF EARLY ACCOMPLISHMENTS

Accomplishment 1. IC Policy Development on Public-Private Talent Exchange

We would like to highlight our progress on the IC policy governing the IC Public-Private Talent Exchange (PPTE) as a key accomplishment. This policy will enable IC personnel to serve on detail assignments in the private sector in order to benefit from the specialized experience, depth, and knowledge available there on select issues. In exchange, private-sector employees will be able to serve in the IC and learn from our unique environment and skill sets.

The PPTE policy makes explicit reference to EO 13985 stating, “In accordance with 50 U.S.C. Sec. 3334, IC elements shall, to the degree practicable, ensure that small business concerns are represented as participants in their PPTE programs. Consistent with applicable law and Executive Order 13985, IC elements shall ensure that the small business concerns represented in their PPTE programs include underserved communities, such as minority-owned and women-owned businesses; Historically Underutilized Businesses or Disadvantaged Business Enterprises-certified businesses; minority-serving institutions, i.e., Historically Black Colleges and Universities, Hispanic-Serving Institutions, and diversity professional, not-for-profit organizations.”

The PPTE memorandum will be available on our unclassified public website where it will be readily accessible and transparent to the public, and we will work to push this information to stakeholder contacts in underserved communities.

Accomplishment 2: Outreach and Engagement to Underserved Communities

Since January 2021, the ODNI has begun to release more unclassified intelligence information and analysis to the American public in ways that are more likely to reach underserved communities. Our Strategic Communications office is disseminating publicly available information to a wider range of media outlets.

Strategic Communications has developed outreach plans to ensure our senior leadership participates in external engagements with ever-broadening, diverse populations. Some recent highlights of this work include the DNI’s engagement at Florida International University in September 2021 and the Principal Deputy DNI’s engagement with Harris-Stowe University in October 2021. We are reaching out to audiences the IC has not engaged with in the past.

Finally, we will ensure that all external video content posted on DNI.gov or ODNI social media accounts includes closed captioning. Over the longer term, we will explore expanding our content to other foreign languages.

(3) EQUITY ACTION PLAN

Action 1: SCIF-as-a-Service (SaaS)

A. The Challenge

Whether responding to classified Request for Proposals (RFPs) or performing work on an

awarded contract, obtaining suitable Sensitive Compartmented Information Facility (SCIF) space has long posed a formidable barrier to entry for companies of all sizes who wish to perform work for the IC. Some of the factors frustrating companies' ability to obtain SCIF space have included:

- SCIF space is typically 2.5 times more expensive to build than normal office space, according to our internal experts.
- Office leases are generally long-term, but companies often only need space for a short-term activity (e.g., for proposal preparation).
- Generally, prior to obtaining SCIF space, a company first must hold a contract and possess appropriate cleared employees.
- SCIF accreditation is a time-consuming process that requires upfront financial outlays.
- The infrastructure necessary for secure connectivity to the Sensitive Compartmented Information (SCI) network is expensive and requires government sponsorship.

This barrier affects both small and some minority- and women-owned businesses, for example. A key feature of SCIF as-a-Service (SaaS) is that while the government continues overall responsibility for the facility security accreditation and SCI infrastructure, space is commercially leased by the SaaS contractor to other companies based on each firm's individual needs. While access to SCI still requires that individuals hold appropriate security clearances, the SaaS framework otherwise removes the government from the mechanics of the business-to-business leasing process once the overall facility approvals have been obtained.

While IC elements devote considerable energy to attract and retain contractual relationships with small businesses, all too often the lack of access to a suitable SCIF facility is recurring and cited as one of the most formidable impediments to participation.

B. The Action

Near- to Mid-term indicators:

The National Reconnaissance Office (NRO) is currently executing a SaaS pilot program under the DNI Acquisition Innovation Pilot Project Initiative. In the near-to-mid-term, the goal is to assess the pilot to determine its scalability for adoption by other IC elements to utilize. Early indicators of the pilot are promising and could expand in other geographic locations. In the next 6-12 months, the ODNI will:

- Continue to support and assess the pilot program that NRO is executing.
- Seek to conduct outreach related to the pilot program.
- Establish regular meetings to discuss the pilot program.
- Update the IC Procurement Executive Council of milestone progress.

Long-term indicators:

Based on the strength of the pilot feedback, the long-term goal is to showcase SaaS to the IC agencies for them to assess its expanded viability. Depending on each agency's determination, SaaS could potentially be expanded to other regions. Furthermore, if one IC element establishes a contract for SaaS, it could potentially be structured to accommodate activities from elsewhere in the Community. Over the next one to three years the ODNI will:

- Conduct a review of the existing methods for establishing the SaaS contract.
- Establish recommended best practices for creating and awarding a SaaS contract.
- Showcase SaaS to the elements for their determination if they will choose to award a contract from their own agency.
- Update the IC Procurement Executive Council on progress and new SaaS locations.

The ODNI prioritized this action because the scale of the security threats facing the United States requires a broad range of traditional and non-traditional solutions. This initiative, in turn, helps ensure that contributions from the broadest possible array of business entities are provided a viable path for acceptance.

- SaaS has great potential to create more equitable access to classified solicitations across the IC and subsequently, over time, increase contract awards to more small businesses and minority-owned companies.
- The proposed action will directly support the desired outcome by giving elements the tools to more easily set up a SaaS. The best practices and guidelines established by DNI, along with showcasing the construct at IC forums, will facilitate IC elements' ability to establish SaaS and broaden its usage across the IC.

C. Tracking Progress

ODNI will track near- to mid-term progress through the establishment of regular SCIF-as-a-Service meetings between ODNI and NRO. In the long-term, ODNI will use metrics to measure the increase in contracts bid on and awarded to small disadvantaged businesses.

D. Accountability

The IC Procurement Executive Council will manage this effort under the guidance of the IC Senior Procurement Executive (IC SPE) to monitor progress during biweekly meetings.

Action 2. Intelligence Science and Technology Partnership (In-STeP)

A. The Challenge

It is the sense of ODNI that non-traditional and disadvantaged businesses face significant barriers to establishing a foothold as vendors to the IC, in part due to the close-hold nature of information in the intelligence profession. The sensitivity of IC mission needs and program requirements typically preclude their public release, and thus limit market insights that many businesses use to shape their own internal research and development (IRAD) investments to better align their capabilities with the IC's future needs and solicitations. Companies with current and past IC contracts are often more familiar with those needs and requirements, and therefore are likely to be more competitive when submitting proposals than companies without an IC past performance record.

B. The Action

As a means for advancing diversity within the IC's acquisition practices, ODNI's Intelligence Science and Technology Partnership (In-STeP) will relay the IC's research and mission challenges to an extensive array of potential participants in the public and private sectors. In this way, In-STeP will inform the IC's science and technology (S&T) investment decisions by ensuring the incorporation of a broad range of diverse informational inputs that can potentially lead to contract awards across a broad array of solution providers.

Purposefully inclusive, the In-STeP program will cast a broad net. If a given technology, research effort, or idea advances the state-of-the-art with respect to IC interests or otherwise provides the IC with an advantage, In-STeP wants to know about it, regardless of origin. Such information exchanges with the private sector, various research centers, and technology providers are vital to ensuring that the IC maintains access to world-class technology, as well as a strong posture against technological surprise. An essential component of that exchange is for partners to understand the IC's often-unique S&T needs, so their research and development can be tailored toward fielding capabilities that ultimately solve intelligence challenges.

The following are examples of how ODNI has worked to expand In-STeP's reach to new partners since the program began in 2014:

- In 2014, ODNI released a Request for Information (RFI) via the NSA's Acquisition Resource Center (ARC) and NRO's Acquisition Research Center (ARC) on the classified Joint Worldwide Intelligence Community System (JWICS) network to better understand how the capabilities of cleared industry vendors aligned to the IC's S&T needs as described in the *FY2015-2019 IC S&T Investment Landscape*, where potential gaps existed, and to promote closer alignment through engagement.
- In an effort to reach a wider audience with its next solicitation in 2017, the In-STeP program created an unclassified version of the *Landscape* document and issued parallel RFIs over both JWICS and the unclassified ARCs on the internet, which allowed In-STeP to open its aperture by directly engaging with uncleared industry.
- In 2019 and 2020, In-STeP continued to solicit responses from uncleared industry by issuing new RFIs on FedBizOpps and SAM.gov, respectively. Through these expanded engagement efforts, In-STeP received submissions and capability briefings from a diverse set of potential solution providers, including women- and veteran-owned small businesses.

STG will augment the In-STeP program by collecting demographic information on potential IC vendors to inform future procurement policy and outreach efforts. Some other actions listed in the document (in the Accountability section) are:

- Through the In-STeP program, STG will facilitate meetings with respondents according to established procedures while working to ensure increasingly diverse and equitable representation.
- Lastly, STG will use information derived from its RFIs to drive future targeted outreach activities to industry consortia that are underrepresented in the above categories.

C. Tracking progress

Moving forward, the In-STeP program plans in FY2022 to release a new RFI on the JWICS ARCs to solicit information on cleared industry capabilities that align to the updated S&T needs captured in the *FY2022-2026 ODNI S&T Investment Landscape*. Mirroring the previous process, ODNI's Science and Technology Group (STG) will also develop an unclassified version of the document to engage the uncleared community via the unclassified ARCs and/or SAM.gov. In its FY22 and future RFIs, STG will seek to capture additional categories of information to better track engagement across non-traditional and disadvantaged stakeholders, such as:

- Small Businesses
- Small Disadvantaged Businesses
- 8a Business Development program participants
- Women-Owned Small Businesses
- Minority-Owned Businesses
- Service-Disabled, Veteran-Owned Small Businesses
- Veteran-Owned Small Businesses
- Companies based in Historically Underutilized Business Zones (HUBZone)
- Small Business Innovation Research (SBIR) program participants
- Small Business Technology Transfer (STTR) program participants
- Geographically diverse companies

To track equity progress, STG will capture annual demographic information of respondents to all RFIs and monitor the ratio of entities that satisfy one or more of the above categories compared to companies historically doing business with the IC. As STG monitors this ratio, it will increase its efforts to promote the program if sufficient representation from the above groups is not being achieved.

D. Accountability

STG will bear primary responsibility for achieving the above goals. For accountability purposes, STG will re-evaluate its approach on a semi-annual basis to ensure the barrier is addressed. Moreover, STG will ensure that an unclassified version of the *FY2022-2026 ODNI S&T Investment Landscape* is created and released via the unclassified acquisition centers or SAM.gov to provide access to a broad and diverse group of potential solution providers. Through the In-STeP program, STG will facilitate meetings with respondents while working to ensure increasingly diverse and equitable representation. Lastly, STG will use information derived from its RFIs to drive future targeted outreach activities to industry consortia that are underrepresented in the above categories.

Action 3. Trade Association Partners

A. The Challenge

The Office of Domestic Engagement, Information Sharing, and Data (DEISD) within ODNI's Policy and Capabilities Directorate is seeking to advance equity and inclusion within stakeholder engagement through ODNI's Trade Association Partners (TAP) engagement forum. Through TAP, ODNI engages trade associations representing industries relevant to advancing the intelligence mission and U.S.

national security. As such, it is important that the TAPs are representative of the expertise from a range of diverse backgrounds.

Over the past three years, DEISD's efforts to engage industry partners has included engagements with approximately 75 different trade associations covering a wide-range of technology, critical infrastructure, and national security relevant sectors. However, none of these engagements were with associations representing relevant private industry owners or professionals with diverse backgrounds.

In the near- to mid-term, the goal of this area of focus is to identify and include in planned engagement activities trade associations that represent minority-, women-, and/or LGBTQ-owned and operated businesses in technology and other fields relevant to U.S. national security. We will seek to understand what barriers exist for these potential partners to access our forums so that we can mitigate them.

The long-term goal of this work is to establish the ODNI's TAP program as a powerful forum for: 1) engaging Private Sector partners fully representative of the diversity of private industry, 2) enabling equitable opportunities across that diversity, and 3) ensuring that the ODNI and IC are collaborating with a wide-range of voices and points of view to enhance national security.

B. The Action

The ODNI DEISD Private Sector Partnership (PSP) group will conduct research to identify trade associations representing the interests of minority-, women-, and LGBTQ-owned and operated businesses and their employees in sectors relevant to ODNI and IC's national security requirements. PSP will draw on this research to set annual TAP targets focused on diverse populations to promote expanded partnerships with and opportunities for these businesses across the IC. PSP will also review the TAP list with both the ODNI Private Sector Working Group (PSWG) and the IC Private Sector Community of Interest to further identify other trade associations that to be included.

Following a nearly two-year pause in ODNI-led TAP meetings resulting from the COVID-19 pandemic, DEISD is in the process of reviewing IC trade association partners to determine which organizations remain relevant to the DNI's priorities – which have changed during the course of the hiatus. As such, included among the goals of this review are the development of a more diverse, equitable, and inclusive TAP program that furthers the IC's broader Diversity, Equity, Inclusion and Accessibility objectives.

Equity assessment findings indicate that the ODNI and IC could better engage, collaborate, and partner with diverse interests. This action would directly support efforts to respond to this finding. The ODNI TAP program has not previously included an explicit effort to identify Trade Associations with the expressed purpose of representing the needs of underserved populations. By seeking out and proactively engaging these associations, ODNI/DEISD expects to identify opportunities to expand the diversity of the IC private sector partnerships

C. Tracking Progress

Near- to Mid-term indicators:

- PSP will identify trade associations representing the interests of minority-, women-, and LGBTQ-owned and operated businesses and include them on the list of invites for upcoming TAP meetings.

- PSP will engage with these newly-identified trade associations to better understand how diverse viewpoints can be highlighted in TAP meetings.

Long-term indicators:

- PSP will review the list of TAP partners on a bi-annual basis to ensure those representing diverse interests are included and active. TAPs participants deemed to be inactive – unresponsive to outreach – will be removed and replaced.
- In 3-5 years the expectation is that at least 10-20% of active TAP partners are representative of diverse interests.

D. Accountability

DEISD/PSP will bear primary responsibility for achieving the above goals. For accountability purposes, DEISD/PSP will re-evaluate its TAP list on a quarterly basis to ensure the barrier is addressed.

Action 4. Identifying and Mitigating Intelligence Officer Bias on Issues of Equity

A. The Challenge

The IC provides policymakers with insights into political, military, economic, diplomatic, and humanitarian challenges faced by countries and peoples around the world. This work frames issues of national security interest for policymakers, informing how they view select situations and providing objective analysis and reporting that helps them make policy choices. Some IC affinity groups have voiced concerns over the characterization of specific groups of people in analysis. Equipping intelligence officers with classroom-based and on-the-job training to spot and mitigate biases is likely to help them identify the equity-related implications of their work. Bias can take many forms: how issues are framed or conceptualized; choices of sources of information and data; the specific words use to describe groups, traits, or challenges; and the types of opportunities and consequences identified for the United States in a given situation. The challenge that we see is ensuring that IC officers have the training, tools, and leadership support necessary to mitigate against implicit bias in their work.

B. The Action

The National Intelligence Manager for Climate Change and Global Issues (NIM-CGI) and Mission Performance, Analysis, and Collection (MPAC) will serve as lead sponsors to survey the IC to identify best practices and to define, identify, evaluate, and mitigate equity-related bias in intelligence. This Action seeks to improve upon the bias training that already occurs within the IC by directing additional attention to the topic of equity.

During the next 6-12 months, those lead offices will identify officers from across the IC to join a working group on equity-related bias in IC production. The working group will:

- Examine current strategies and best practices for ensuring objectivity and defining, identifying, and reducing equity-related bias in all aspects of the intelligence production process, including collection and reporting, constructing a program of analysis, conceptualizing analysis, drafting analysis, and editing analytical product.
- Identify types or areas of IC collection and analysis that are particularly prone to bias and

- characterize the types of bias.
- Develop lexicons for areas of identified types or areas of collection and analysis to encourage consistent usage of non-biased terms across Departments and Agencies. Successful implementation should lead to reduced concerns over how certain groups are characterized.
- Raise awareness of the ways equity issues are impacted by foreign policy decisions and, subject to Presidential Intelligence Priorities, encourage intelligence officers to consider equity issues in their work, while avoiding advocacy and maintaining analytic objectivity standards.
- Engage with IC training programs to discuss potential for including or maturing discussion of bias and equity in training courses and take steps to fill any gaps identified. Because revising curriculum takes time, this likely will extend as a medium-term activity.
- Partner with senior reviewers across the IC, including at the President’s Daily Brief staff, to screen finished analytical product for bias and eliminate terms that may—intentionally or not—contribute to perpetuation of bias and lack of equity.

C. Tracking Progress

NIM-CGI and MPAC will work iteratively with the analysis offices of its Department and Agency partners and their affinity groups, and periodically survey finished analysis to check progress. They will also survey IC officers as to the value of the training and resource that they receive. If we find particular areas of bias, we will work with the relevant Departments and Agencies on ways to mitigate them.

D. Accountability

MPAC will produce a report to the DNI on an annual basis on how the IC is doing on this issue.

Action 5. Advancing Civil Rights

A. The Challenge

Section 508 of the Rehabilitation Act of 1973 provides that each Federal agency must ensure that the information and communication technology (ICT) it develops, procures, maintains, or uses is accessible to individuals with disabilities who are Federal employees or applicants, or members of the public seeking information or services from the agency. It has been identified that ODNI needs to improve communications in regard to rights under Section 508 of the Rehabilitation Act.

Section 501 of the Rehabilitation Act of 1973, provides that each Federal agency submit an Affirmative Action Plan for the recruitment, hiring, advancement, and retention of persons with disabilities for the Equal Employment Opportunity Commission (EEOC)’s review and approval, consistent with 29 C.F.R. 1614.203 and as Part J of the MD-715 reporting requirement. It has been identified that ODNI needs to post the ODNI Affirmative Employment Plan on the ODNI public-facing webpage.

The Architectural Barriers Act of 1968 (42 U.S.C. 4151-4157) requires certain Federal agencies with federally funded buildings and other facilities to be designed, constructed, or altered in accordance with standards that insure accessibility to, and use by, individuals with physical disabilities. It has been identified that ODNI needs to improve communications in regard to rights under the Architectural Barriers Act.

B. The Action

Section 508 of the Rehabilitation Act of 1973:

The ODNI will develop a notice specific to employees' and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint. The 508 Complaint process will also outline the process for a member of the public to file a 508 complaint.

Section 501 of the Rehabilitation Act of 1973:

ODNI Office of Strategic Communications will post the ODNI Affirmative Employment Plan on the ODNI public-facing webpage.

Architectural Barriers Act of 1968:

The ODNI will develop a notice that explains employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

C. Tracking progress

Section 508 of the Rehabilitation Act of 1973:

By September 30, 2022, the ODNI will communicate the notice in regard to rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

Section 501 of the Rehabilitation Act of 1973:

By February 28, 2022 the ODNI Office of Strategic Communications will post the ODNI Affirmative Employment Plan on the ODNI public-facing webpage.

Architectural Barriers Act of 1968:

By September 30, 2022, the ODNI will communicate the notice that explains employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

D. Accountability

The ODNI Office of IC Diversity, Equity, and Inclusion (IC DEI) will bear primary coordination for achieving the above goals. For accountability purposes, IC DEI will re-evaluate on a quarterly basis to ensure each item is addressed.