Hearing Aids in Sensitive Compartmented Information Facility (SCIF) Environments, in partnership with AVAA

Kimberly Jenkins, AuD

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Disclosures

- **Presenter Disclosure**:
  - Financial: Kimberly Jenkins is an employee of Walter Reed National Military Medical Center.
  - Non-financial: Kimberly Jenkins has no relevant non-financial relationships to disclose.
    - In lieu of an honorarium, a donation has been made to AVAA in the form of AudiologyOnline CEU memberships.
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  - This learning event does not focus exclusively on any specific product or service.
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Limitations/Risks

- The applicability and accuracy of the course content may vary by the clinical, geographical, and cultural context; you should evaluate the course accordingly.
- As healthcare is rapidly evolving, new findings may change the validity of the information presented in this course. Providers should always consult the latest research and guidelines from professional associations.
- The interventions discussed in this course may be limited in generalizability, requiring practitioners to consider specific individual and population factors.
- The course may not cover all possible risk factors, diagnostic methods, or treatment options, and complex cases may require additional considerations.
- Healthcare providers should apply cultural competence and sensitivity to ensure effective and respectful care based on their patients' diverse needs.
- Providers should always evaluate the limitations of diagnostic and screening tools, considering their potential for false results as well as any ethical implications.
- It is the responsibility of course participants to critically evaluate the evidence from multiple sources to guide professional practice.

Learning Outcomes

After this course, participants will be able to:

1) Describe the challenges audiologists face when fitting hearing aids to patients who work with secure compartmented information facility (SCIF) environments.
2) List the features of hearing aids that are considered “high-risk” to governing bodies within SCIF environments.
3) Utilize strategies currently used by providers within the National Capital Region(NCR) for fitting hearing aids to individuals working within SCIF environments.

Caveats

- Topic common in the military, VA and government, growing within commercial sector
- Ever-evolving challenge audiologists face
  - As such, present-day recommendations may not always be a viable option tomorrow
- Informational discussion based on the past 5.5 years of working as a DoD audiologist
  - Advantages – patient population and resources within the NCR
  - Not in a position of authority
- Not an endorsement of any one solution or hearing aid manufacturer

BLUF

1. Restricted work environments exist in the government **AND** in the private sector (SCIFs being the most secure)
2. The hearing aids you fit every day **CAN** be worn in restricted environments
3. Steps must be performed (by audiologist & patient) **PRIOR TO** allowance of hearing aids in secure locations
4. Two features under scrutiny → Bluetooth and Hands-free technology
5. Hands-free **CAN** be disabled in the software **WITHOUT** impacting connectivity
6. Bluetooth capability **CANNOT** be disabled in the software by the audiologist

Today's Hearing Aid Landscape

Goal → Provide ease of communication and a more natural listening experience

- Significant improvement in speech-in-noise performance
- Enhanced "directional" microphone technology
- Motion-sensor technology
- Tech-savvy
  - Bluetooth technology allowing connection to external audio devices
  - Bi-directional microphone technology allowing for hands-free listening

Encountering the Problem

- Working within the National Capital Region (NCR):
  - High proportion of military and veteran population
    - Hearing and tinnitus symptoms that impact daily activities
    - Most recommended treatment method → hearing aids
  - Military plays a significant role within the intelligence community
    - Veterans/service members have assigned duties placing them in Sensitive Compartmented Information Facility (SCIF) environments
- High incidence of hearing aid denials in the workplace reported by patients (mainly NSA workforce)

Most appropriate form of treatment may pose a risk to national security

Why?

Phone call to the NSA security office revealed:

Hands-free functionality

The SCIF Environment

- Contain the country's confidential, secret, and top-secret information
- Technology within these environments is highly controlled
  - No recording devices, electronic storage devices, electronic transmitting devices
  - Implications for hearing aids → Bluetooth and hands-free technology potentially poses a risk to national security
- Most important (and challenging) aspect:
  - Regulations of any given SCIF are made by the owner of the SCIF, wide variation in allowances across the intelligence community
  - There is not a single person or organization that overlooks these regulations
  - So… SCIF ≠ SCIF ≠ SCIF
- National Security Agency (NSA) in general has the most rigorous process for vetting devices and creating guidelines and mitigation strategies
  - Other SCIF policy makers look to them for guidance

Breaking Point

- Discussions with colleagues and hearing aid manufacturers revealed no solution for this issue, and little awareness that there of a growing problem
- 2022 no RIC products were available to government audiologists were allowed within NSA regulated facilities
- Solutions were critical:
  - Meetings with intelligence community (NSA specifically) for acceptable remediation
  - Collaboration with hearing aid manufacturers to produce viable solutions for government and civilian patients

NSA Guidelines

- Acceptable devices:
  - No hands-free technology, or feature is permanently disabled by audiologist
  - Disabling the hands-free technology:
    - Cannot be undone by firmware updates (software or app) or patient in any way
    - Cannot negatively impact other features within the hearing aids
    - Documentation of disabled feature required (specifics yet to be determined)
    - Ultimately would like to see this pushed to the civilian sector
  - Note on Bluetooth – within the NSA, Bluetooth technology is well-managed and does not pose a significant threat (can change with technology changes, however…)
    - Other secure locations are more restrictive of Bluetooth technology, but may make exceptions for wearable medical devices (MEDs)
- Training of any dispensing audiologist required for innovative remediation

Mitigation Strategy Specifics

Disabling bi-directional capability (Hands-free or “hot” microphone)

- Within hearing aid programming software
  - “Permanently” disabled for duration of time patient works within SCIF environment
  - Patient unable to re-enable through app/program buttons
- Compliance letter stating Hands-free has been disabled
  - Manufacturer specific → provided by each manufacturer
  - Contains make, model, serial numbers, as well as fitting audiologist
  - Patient to provide to their security officer for registration of devices before they will be allowed into SCIF locations

Current Amplification Options

- Hearing aids without wireless options or with limited connectivity features generally will be allowed within SCIF environments
  - IIC, CIC, additional custom hearing aids
- Recall → main concern is hands-free capabilities, so RIC/RITE devices will be more of an issue
  - Three major hearing aid manufacturers offer devices in which hands-free capabilities can be disabled in the software
    - ✓ Vetted by and deemed acceptable by the NSA
    - ✓ Available in the government contract and the civilian sector
  - Other major hearing aid manufacturers are working toward solutions for this patient population to be available in the future

Managing the Patient

- During the fitting:
  - Disable hands-free in software as needed
  - Ensure familiarity with airplane mode functionality and proper use of hands-free features
  - Provide make/model and serial number information (security letter, hands-free disabled documentation as needed) → patient will need to register their devices with their employer
- Patients believe they cannot have hearing aids within SCIFs, this is not the case
  - Most of the time they assume because there is Bluetooth they are not allowed
  - Typically they have not inquired about the process, or haven't registered their devices

Receiving information

- Handouts
- Manufacturer reps

Current Hurdles

1. Disseminating information
2. Bluetooth ambiguity

Disseminating Information

- Locations following NSA guidelines (but *not* the NSA) do not always have access to up-to-date changes in accepted technology
  - ICD-124: guidelines for regulating electronic medical devices for all intelligence community entities → must be followed by **all** SCIF environments
    - SCIF environments in the commercial sector are still governed by an IC element (NSA, CIA, etc.)
  - Air Force/Space Force
    - Memorandum: *Security Guidance for the Use of Electronic Medical Devices and Portable Wearable Fitness Devices in Secure Spaces → Section 4.2.2.4*
  - Navy/Marine Corps, majority of Coast Guard
    - Cognizance of NSA
  - More ambiguity within Army secure locations

➢ Hearing aid denials may be the result of inaccurate information or lack of knowledge regarding updates → Patient must go through proper registration procedure

Bluetooth

- SCIF Regulations – Intelligence Community Directive ICD/ICS-705
  - All DoD SCIFs (civilian and military) are governed by the ICD/ICS-705
  - Interpretation varies widely
  - Chapter 10 covers Personal Electronic Devices (PEDs) and Medical Electronic Devices (MEDs)
    - ✓ Section A.4. indicates that any medical device can be reviewed for approval for entry into SCIF
- To comply with ADA regulations **MEDs** are typically given exceptions in regard to Bluetooth technology

However, entrance is ultimately up to the regulating security office

Audiologic Impacts

- Advancements in technology are ever-changing and provide the patient improved communication ability in numerous listening environments
  - Communication is critical for all individuals, and workplace should not limit patient options
- More options are becoming available for this patient population, and the better informed all audiologists are the more effective care the patient will receive
- Working to ensure all patients receive optimal hearing aid technology is the cornerstone of standard of care

Thank you!

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