INFORMATION SECURITY OVERSIGHT OFFICE
NATIONAL ARCHIVES and RECORDS ADMINISTRATION
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ISOO Notice 2026-02: Prohibition on the Use of Combination Translator Applications to Generate Lock Combinations that Protect Classified Information

June 10, 2026

Purpose and Background

1. ISOO has been made aware of the use of combination translation applications on various electronic devices (e.g., cellular phones, tablets, computers) that are able to use a derivative of the telephone keypad to convert a lock combination into, or select a lock combination containing, a word, phrase, or letters, allowing the custodian to more easily recall the combination.

2. This Notice provides guidance regarding the use of such lock combination translation applications as they apply to General Services Administration (GSA) approved security equipment authorized for the safeguarding of classified national security information (classified information).

3. This guidance pertains to Federal agencies and is binding on agency actions as authorized under law and similar authority. This guidance does not apply to, and is not meant to bind, the public, except as authorized by law or regulation or as incorporated into a contract.

Responsibilities

4. Pursuant to Executive Order 13526, section 5.1(a)(2), the Director of ISOO is responsible for establishing standards for safeguarding classified information, which shall pertain to the handling, storage, distribution, transmittal, and destruction of and accounting for classified information. ISOO has issued 32 CFR 2001, which implements specific safeguarding requirements for classified information under this authority.

Guidance

5. The use of combination translation applications to generate, store, transmit, translate, convert, or decipher lock combinations on electronic devices not accredited for handling the level of classified information protected by the lock itself is prohibited under 32 CFR 2001. Use of such applications creates an unacceptable level of risk of compromise of combinations used for protecting classified information.

6. Pursuant to 32 CFR § 2001.45(a)(1), combinations to locks used to secure vaults, open storage areas, and security containers that are approved for the safeguarding of classified information must be protected in the same manner as the highest level of classified

information that the vault, open storage area, or security container is used to protect. This requirement also pertains to computer and information system passwords, which must be protected in the same manner as the highest level of classified information that the computer or system is certified and accredited to process.

Definition

7. A combination translator application refers to any software, tool, or application designed or used to interpret, convert, reveal, or display the input patterns, numerical or letter sequences, or combination codes required to gain access to a secured physical or digital locking mechanism. This includes, but is not limited to, software, tools, or applications that:

   a. Generate, analyze, store, or transmit data related to a lock combination (e.g., dial rotations, button presses, or sensor outputs);

   b. Convert codes or physical interactions into decipherable words, phrases, or letters;

   c. Emulate the function of a lock's internal mechanism to deduce the combination; or

   d. Facilitate access to a secured area or device without using the original or authorized combination.

This is not meant to exclude Americans with Disabilities Act (ADA) compliance software.

Authorities

Executive Order 13526, Classified National Security Information

32 Code of Federal Regulations (CFR) 2001, Classified National Security Information. §§ 2001.42, Standards for Security Equipment; 2001.43(c), Storage, Combinations; 2001.45, Information Controls; 2001.50, Telecommunications Automated Information Systems and Network Security.

This Notice has been coordinated with the Interagency Committee on Security Equipment and GSA, and is consistent with the authorities provided for in 32 CFR § 2001.42. Please direct any questions regarding this ISOO Notice to: isoo@nara.gov.

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Director