

**FISH AND WILDLIFE SERVICE  
PERSONNEL**

**Personnel**

**Part 227 Personnel Relations and Services**

**Chapter 6 Implementation of Anti-Harassment Procedures**

**227 FW 6**

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**OVERVIEW**

**6.1 What is the purpose of this chapter?**

**A.** This chapter:

- (1) Supplements Personnel Bulletin 18-01 “Prevention and Elimination of Harassing Conduct,” the [Department of the Interior’s \(Department\) anti-harassment policy](#), and
- (2) Establishes operational guidance specific to the U.S. Fish and Wildlife Service (Service) for responding to harassing conduct.

**B.** This chapter:

- (1) Is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its departments, agencies, bureaus, instrumentalities or entities, its officers or employees, or any other person.
- (2) Does not replace the Equal Employment Opportunity (EEO) complaint process. Corrective action under this policy does not provide the remedies available in the EEO, grievance, or other processes, such as compensatory damages. Filing a report under the Department’s anti-harassment policy does not satisfy the requirements for filing an EEO complaint, negotiated grievance, or other procedure and obtaining remedies for them, nor does it delay the time limits

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for initiating those procedures. For more information about EEO complaints, see Parts 060 - 061 of the Service Manual.

**6.2 What are the goals and objectives of the chapter?**

**A.** The goal of the chapter is to prevent and address harassing conduct that is, or has the potential to become, so severe or pervasive that it may constitute a violation of the law.

**B.** The objectives of the chapter are to:

**(1)** Provide a clear process for employees to report harassing conduct and for management to respond to it;

**(2)** Ensure that appropriate officials are notified and have the opportunity to promptly correct harassing conduct; and

**(3)** Establish a process that:

**(a)** Is distinct and independent from the EEO complaint process, and

**(b)** Requires management to take immediate and appropriate corrective action to address and eradicate harassing conduct, regardless of whether the behavior rises to the level of violating the law (i.e., even if it is simply inappropriate).

**6.3 What is the Service's policy regarding harassing conduct and reprisal? The Service:**

**A.** Strives to create and maintain a work environment in which people are treated with dignity, decency, and respect, and are free from discrimination and harassing conduct. Our workplace should be characterized by mutual trust and the absence of intimidation, oppression, and exploitation.

**B.** Does not tolerate the use of derogatory words, phrases, epithets, gestures, pictures, drawings, or cartoons that are based on an individual's race, color, religion, sex (including pregnancy and gender identity), sexual orientation, national origin, age, disability, genetic information (including family medical history), status as a parent, marital status, political affiliation, or protected activities, regardless of the means of delivery (e.g., verbal or electronic communication).

**C.** Does not tolerate retaliation against any employee for reporting harassing conduct, discrimination, or retaliation; filing a claim of harassing conduct; providing evidence in an investigation; or intervening to protect others who may have suffered harassing conduct, discrimination, or retaliation.

**D.** Takes appropriate corrective and disciplinary action when a Fact Finding Report (FFR) supports a finding that misconduct has occurred, or when a manager or supervisor fails to follow the procedures in this chapter.

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**6.4 What are the authorities for this chapter?**

- A. Department of Interior Personnel Bulletin (DOI PB) Number 18-01: Prevention and Elimination of Harassing Conduct.
- B. EEO Commission (EEOC) Notice 915.002: EEOC Enforcement Guidance; Vicarious Employer Liability for Unlawful Harassment by Supervisors (June 18, 1999).
- C. Merit System Principles (Notification and Federal Employee Antidiscrimination and Retaliation Act of 2002, as amended) (5 U.S.C. 2301).
- D. Prohibited Personnel Practices (5 U.S.C. 2302).
- E. 370 Departmental Manual (DM) 752, Discipline and Adverse Actions.
- F. 370 DM 771, Administrative Grievance Procedures.

**6.5. What terms do you need to know to understand this chapter?**

**A. Employment actions** are decisions that significantly change an employee’s employment status. Such actions include, but are not limited to, hiring, firing, promoting, demoting, and reassigning an employee.

**B. Harassing conduct**, and specifically what type of conduct is prohibited, is defined extensively in [DOI PB 18-01](#), section 5.

**C. Reprisal or retaliation** occurs when employees are treated differently because they are, or were, engaging in protected activity. Protected activity includes reporting harassing conduct, discrimination, or retaliation; filing a claim of harassing conduct; providing evidence in any investigation; or intervening to protect others who may have suffered harassing conduct, discrimination, or retaliation.

**RESPONSIBILITIES**

**6.6 Who is responsible for implementing the anti-harassment program? See Table 6-1.**

**Table 6-1: Responsibilities for the Anti-Harassment Program**

These employees...	Are responsible for...
<b>A. The Director</b>	Providing overall direction and oversight for the Service’s anti-harassment program.

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These employees...	Are responsible for...
<b>B. Directorate members</b>	<p>(1) Ensuring employees are informed of the Service's anti-harassment policy and procedures,</p> <p>(2) Promoting management and employee efforts to eliminate harassing conduct,</p> <p>(3) Ensuring appropriate actions are taken to enforce the anti-harassment policy and procedures, and</p> <p>(4) Appropriately evaluating subordinate managers and supervisors on their performance under the procedures in this chapter.</p>
<b>C. Deputy Regional Directors/Deputy Assistant Directors/Deputy Chiefs (DRD/DAD/DC)</b>	Overseeing the process to address claims by ensuring the requirements for inquiries, reports, and any necessary employment actions comply with this chapter.
<b>D. Executive Anti-Harassment Team (Deputy Director serves on the team and appoints approximately six other Directorate members to serve on a rotating basis)</b>	<p>(1) Establishing two Fact Finding Report (FFR) Panels, whose members serve to analyze FFRs, determine whether misconduct occurred, and propose appropriate discipline; and</p> <p>(2) Making a final determination when there is disagreement between the manager/supervisor and the FFR panel.</p>
<b>E. Managers and Supervisors</b>	<p>(1) Making every effort to provide a work environment free of illegal harassing conduct;</p> <p>(2) Ensuring that employees know the specific procedures for reporting harassing conduct and providing training on those procedures;</p> <p>(3) Handling allegations of harassing conduct promptly, thoroughly, and appropriately, in accordance with the time sensitive procedures in this chapter and DOI PB 18-01;</p> <p>(4) Informing any alleged victim of his or her options and rights for addressing the alleged harassing conduct, including the right to consult the Office of Diversity and Inclusive Workforce Management (ODIWM) about harassing conduct involving any allegations of unlawful EEO discrimination;</p> <p>(5) Consulting with the servicing Human Resources Office (HRO) and taking prompt and appropriate corrective and disciplinary action, as necessary;</p> <p>(6) Documenting all efforts to address harassing conduct allegations; and</p>

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These employees...	Are responsible for...
	<p><b>(7)</b> Protecting employees who report misconduct from retaliation.</p>
<p><b>F. Chief, Headquarters Division of Human Resources (HQ HRO)</b></p>	<p><b>(1)</b> In collaboration with ODIWM, establishing and updating policies, procedures, and guidelines to administer the Service's anti-harassment program;</p> <p><b>(2)</b> Providing oversight, technical assistance, and support to all management officials, employees, and Regional HROs to ensure compliance with this policy;</p> <p><b>(3)</b> When he/she receives reports alleging violations of the Service's policy, taking appropriate action as we describe in this chapter;</p> <p><b>(4)</b> Informing the alleged victim of his or her options and rights for addressing the alleged harassing conduct, including the right to consult ODIWM about any allegations of unlawful EEO discrimination;</p> <p><b>(5)</b> When there is a conflict of interest, such as an allegation against a Directorate member, referring allegations to the Deputy Director to assign another program or Region to conduct an investigation;</p> <p><b>(6)</b> Maintaining a written record of harassing conduct reports and actions taken at HQ;</p> <p><b>(7)</b> Tracking reports made and actions taken under this chapter in line with the Department's Office of Human Resources case tracking procedures;</p> <p><b>(8)</b> Reporting quarterly on alleged harassing conduct, findings, and actions taken at HQ to the Chief, ODIWM; and</p> <p><b>(9)</b> As appropriate, developing, conducting, and coordinating training with ODIWM and the National Conservation Training Center (NCTC) on harassing conduct in the workplace.</p>

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These employees...	Are responsible for...
<b>G. Chief, ODIWM</b>	<p><b>(1)</b> Providing support and technical assistance on the procedures in this chapter, as requested, to ensure compliance, including explaining the differences between these procedures and the EEO complaints process and referring alleged victims within 1 business day to the servicing HRO without getting into details about specific incidents;</p> <p><b>(2)</b> Informing the alleged victim, as appropriate, of his or her options and rights for addressing the alleged harassing conduct, including the right to consult an EEO counselor about harassing conduct involving any allegations of unlawful discrimination; and</p> <p><b>(3)</b> As appropriate, developing, conducting, and coordinating training with the HQ HRO and NCTC on harassing conduct in the workplace.</p>
<b>H. Regional Human Resources Officer (HRO) and his/her staff</b>	<p><b>(1)</b> Providing technical assistance and support to management officials and employees in the Region to ensure compliance with this chapter;</p> <p><b>(2)</b> When they receive reports alleging violations of the Service's policy, taking appropriate action as we describe in this chapter;</p> <p><b>(3)</b> Informing the alleged victim of his or her options for addressing the alleged harassing conduct, including the right to consult ODIWM about harassing conduct involving any allegations of unlawful EEO discrimination;</p> <p><b>(4)</b> When there is a conflict of interest, referring allegations of harassing conduct to the HQ HRO;</p> <p><b>(5)</b> Maintaining a written record of harassing conduct reports and actions taken in the Region in accordance with this chapter;</p> <p><b>(6)</b> As appropriate, developing, conducting, and coordinating training with the HQ HRO and ODIWM on harassing conduct in the workplace; and</p> <p><b>(7)</b> Tracking reports made and actions taken under this chapter in line with the Department's Office of Human Resources case tracking procedures, and reporting on them to the HQ HRO.</p>

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These employees...	Are responsible for...
<b>I. Employees and other people who are performing work on behalf of the Service</b>	<p><b>(1)</b> Acting professionally and refraining from engaging in harassing conduct;</p> <p><b>(2)</b> Understanding the provisions of this chapter;</p> <p><b>(3)</b> Complying with all procedural requirements and cooperating with any investigation;</p> <p><b>(4)</b> Participating in periodic training;</p> <p><b>(5)</b> Promptly reporting incidents of harassing conduct that they witness as described in this chapter and DOI PB 18-01; and</p> <p><b>(6)</b> If they have been subjected to harassing conduct, we encourage employees to inform the person(s) responsible for the conduct that it is unwelcome and offensive, and request that it stop. If the conduct continues, is severe, or if the employee is uncomfortable addressing the responsible person(s) about the conduct, the Service <b>encourages</b> the employee to report the matter as we describe in this chapter and DOI PB 18-01.</p>

**6.7 What are the procedures for reporting harassing conduct and managers' and supervisors' duty to act?**

**A. Reporting harassing conduct:** Individuals must take the following actions to avoid harm from unlawful harassing conduct:

**(1)** When appropriate, promptly and professionally inform the person responsible for the conduct that his or her behavior is unwelcome, offensive, and must stop.

**(2)** Individuals who have witnessed harassing conduct directed at others that is in violation of our policy, should immediately report the behavior either verbally or in writing to:

- (a)** A supervisor or management official,
- (b)** An employee in their servicing HR office—either the HRO or a member of the Employee Relations staff,
- (c)** The Office of the Inspector General (OIG), or
- (d)** The anti-harassment hotline at 1-844-437-6578.

**(3)** Individuals who have been subjected to harassing conduct are encouraged to report the matter to:

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- (a) A supervisor or management official,
- (b) The servicing HR office,
- (c) The OIG, or
- (d) The anti-harassment hotline at 1-844-437-6578.

(4) Non-employees, such as volunteers and visitors, should immediately notify a Service supervisor. They may also contact or call any of the entities in the subsections above.

(5) Contractors should contact their employer immediately. They should also inform a Service supervisor or an employee in the servicing HR office (either the HRO or a member of the Employee Relations staff).

(6) To the greatest extent possible, confidentiality will be protected for the individual who reports harassing conduct, except as necessary to conduct an appropriate investigation of the alleged violation(s), to take appropriate corrective action, to comply with the reporting requirements of this policy, or when otherwise required by law. We are committed to ensuring that allegations of harassing conduct are shared only with those who have a business need to know.

**B. Managers'/supervisors' duty to act:**

(1) Managers or supervisors who observe or are informed of allegations of harassing conduct must:

- (a) Report the conduct/allegations to the appropriate officials, even if the employee raising the allegation requests confidentiality (see [subsections 6.8A and B](#));
- (b) Ensure that a prompt, objective, and thorough investigation is conducted; and
- (c) Take steps to ensure that the harassing conduct is appropriately addressed to deter further misconduct, including taking disciplinary action, if appropriate (see [subsection 6.8C](#)).

(2) The fact that a potential victim of harassing conduct will or has filed an EEO complaint or grievance alleging harassing conduct does not relieve a manager/supervisor of his or her duty to act as this chapter requires. Multiple inquiries and investigations into a given complaint may proceed in parallel.

(3) The Service will take appropriate corrective action, disciplinary or otherwise, up to and including removal, against any supervisor or other management official who fails to perform his or her obligations, including any failure to report known violations of this policy.

**C. Distinction from EEO and other remedial procedures.** This policy and its reporting procedures are separate and distinct from the EEO process, which focuses on making employees whole after they have experienced discrimination (including harassing conduct) by issuing remedial relief, such as compensatory damages.

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(1) This policy does not replace an employee's EEO or other rights.

(2) Reporting allegations of misconduct under this policy does not satisfy the requirements for filing an EEO complaint, administrative or negotiated grievance, or other procedure, nor does it delay the time limits for initiating those procedures. See Parts 060 - 061 of the Service Manual for more information.

**6.8 How must managers/supervisors and other management officials respond to allegations?**

**A. Within 1 business day:** a manager, supervisor, or other official who receives a report of, or otherwise becomes aware of, harassing conduct must:

(1) Document the allegation in writing using [FWS Form 3-2437, Harassing Conduct Allegation Intake Form](#).

(2) Acknowledge receipt of the report to the reporting party.

(3) Notify his/her own first-line supervisor or, if the conduct implicates the first-line supervisor, notify the second-line supervisor.

(4) Notify:

(a) The supervisor of the person who is allegedly harassing the other person, and

(b) The alleged victim's supervisor or the Regional HR office (either the HRO or a member of the Employee Relations staff) if the conduct implicates the supervisor or another manager.

**B. Within 1 business day:**

(1) A manager or supervisor who receives allegations must also contact the servicing HR office (either the HRO or a member of the Employee Relations staff).

(2) Failure to report the allegation could result in disciplinary or adverse action being imposed upon the manager or supervisor for inaction.

**C. As soon as possible:**

(1) The managers/supervisor must:

(a) In consultation with the servicing HRO, the manager/supervisor must determine:

(i) What conduct is at issue, whether it arguably could be considered harassing conduct, and whether it is potentially criminal in nature;

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**(ii)** Who may be involved;

**(iii)** Whether the reported activity poses a security risk and whether it is necessary to alert law enforcement (e.g., in instances where there is a threat of immediate physical harm); and

**(iv)** What interim measures should they implement, as appropriate, to ensure harassing conduct does not continue.

*If the report is made outside of the regular business hours of the servicing HR office, managers/supervisors should take action based on their best judgment to minimize any perceived risk of immediate harm, and contact the servicing HR office as soon as normal business hours resume.*

**(b)** Take measures as described in DOI PB 18-01 Section 7.B.3 (immediately if necessary) to stop any inappropriate conduct and prevent further harassing conduct or retaliation while an investigation is being conducted.

**(c)** Assure the individual who reports alleged harassing conduct that the Service will:

**(i)** Conduct a prompt, thorough, and impartial investigation;

**(ii)** Protect his/her confidentiality to the extent possible; and

**(iii)** Take immediate and appropriate corrective action when it has been determined that harassing conduct has occurred.

**(d)** Inform the individual making the allegations of his/her right to:

**(i)** Seek EEO counseling from ODIWM within 45 calendar days from the date of the alleged harassing conduct if the basis for the harassing conduct is covered under EEO discrimination laws or statutes;

**(ii)** File a grievance in accordance with the terms of his/her formal bargaining contract, if applicable, or pursue an administrative grievance under 370 DM 771; and

**(iii)** Seek relief through any other statutory process.

**(e)** If the person who was allegedly harassed requests anonymity, the manager/supervisor must still perform the duties we describe in this chapter by taking prompt action to prevent and correct any harassing conduct. The manager/supervisor must make clear to the alleged victim that:

**(i)** All reports of alleged hostile or abusive conduct and related information will be maintained on a confidential basis to the greatest extent possible. The identity of the employee alleging violations of this policy will be kept confidential except as

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necessary to conduct an appropriate investigation into the alleged violation or to take appropriate disciplinary or corrective actions, to comply with the reporting requirements of this policy, or when otherwise required by law;

(ii) Information about the allegation of harassing conduct will be shared only with those who have a business need to know about it; and

(iii) Management has an obligation to take action upon learning of harassing conduct, even if the employee requests no action be taken.

(2) The HR office (either the HRO or a member of the Employee Relations staff) notifies the Harassment Duty Attorney in the Office of the Solicitor (SOL) at [SOL-Antiharass@sol.doi.gov](mailto:SOL-Antiharass@sol.doi.gov) and the DRD/DAD/DC about the allegations.

**D. Allegations reported directly to the servicing HR office:** When the servicing HR office receives an allegation of harassing conduct:

(1) The HR office must complete the steps we describe in section 6.8A.

(2) The HR office must also inform the alleged victim of his or her options and rights for addressing the alleged harassing conduct, including the right to consult ODIWM on harassing conduct involving any allegations of unlawful EEO discrimination.

(3) If determined necessary, the manager/supervisor to whom the allegation is sent, in conjunction with the Employee Relations Specialist, must ensure that a prompt, thorough, and impartial investigation of the allegation is initiated within 2 business days from the date in which the allegations were brought to his/her attention. See sections 6.9 and 6.10 for more information on how investigations are conducted.

(4) The servicing HR office (either the HRO or a member of the Employee Relations staff) also serves as an advisor for conducting the investigation and monitors the processing of the harassing conduct allegations to ensure that those responsible are meeting the required timeframes.

(5) When there is a conflict of interest at the Regional level, the Regional HR office must immediately refer it to the HQ HRO. When there's a conflict at HQ, the HQ HRO must refer it to the Deputy Director as soon as possible.

(6) The HR office must notify the Harassment Duty Attorney in SOL at [SOL-Antiharass@sol.doi.gov](mailto:SOL-Antiharass@sol.doi.gov).

**E. Allegations reported directly to ODIWM:** When ODIWM receives an allegation of harassing conduct outside of the EEO process, staff must:

(1) Complete the steps we describe in section 6.8A.

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**(2)** Provide support for and technical assistance, as requested, to ensure compliance with this chapter, including explaining the differences in the requirements and responsibilities between this chapter and the rights and requirements under the EEO complaints process.

**(3)** Advise the alleged victim of his/her options and rights for addressing the alleged harassing conduct, including the right to consult about harassing conduct involving any allegations of unlawful discrimination.

**(4)** Within 1 business day, report the allegation to the servicing HR office (either the HRO or a member of the Employee Relations staff), as appropriate, and provide them with the alleged victim's name and contact information.

## **INVESTIGATIONS**

### **6.9 What is an investigation, and how does the Service conduct one?**

**A. Description:** An investigation:

**(1)** Is an examination that usually involves collecting statements and, if relevant, supporting evidence, and

**(2)** Must result in a record sufficient enough to:

**(a)** Support any corrective or disciplinary action taken, or

**(b)** Indicate that there is not enough evidence to support such an action.

**B. Timing and investigation decisions:**

**(1)** Within 3 business days of the receipt of the allegation, the manager/supervisor (or designee) of the employee who is allegedly harassing another, must consult with the servicing HR office (either the HRO or a member of the Employee Relations staff) to determine whether and what type of further investigation is required (see DOI PB 18-01 Section 7.D.) and if the preliminary information is sufficient to determine whether corrective action is necessary. (The HR office (either the HRO or a member of the Employee Relations staff) will consult with the SOL.) These decisions are fact-specific and must be made on a case-by-case basis. Any disagreement between the responsible management official and the SOL or HR office should be directed to the HQ HRO.

**(2)** If the officials above determine an investigation is necessary, the servicing HR Specialist ensures that the investigative process is initiated within 2 business days of that decision. The servicing HR Specialist is the primary point of contact for logistics related to getting an internal or third-party investigator in place, as well as when the allegations have been referred for criminal investigation or to the OIG.

**(3)** Following are guidelines for determining which entity is the best investigating lead:

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- (a) OIG: Allegations of criminal activity and allegations implicating a member of the Senior Executive Service (SES), or other senior or prominent management official.
- (b) Office of Law Enforcement Professional Responsibility Unit: Allegations involving law enforcement personnel.
- (c) Third-party investigators: Allegations of harassing conduct of a sexual nature.
- (d) All other allegations under this policy may be handled by a third-party investigator, Employee Relations Specialist(s), manager/supervisor, or another employee trained to conduct investigations.

(4) The manager/supervisor (or designee) of the employee who is allegedly harassing another, in consultation with the servicing HR office (either the HRO or a member of the Employee Relations staff) and SOL, makes the final decision about the investigation method based on the complexity and scope of the allegation(s) and the availability of qualified investigators.

(5) DOI PB 18-01 provides detailed guidance regarding the responsibilities of other entities to conduct an investigation subsequent to a report of harassing conduct.

**C. Mechanics of the investigation:**

(1) The alleged harasser's program must pay for any costs for an investigation.

(2) The alleged harasser's manager/supervisor (or designee), in consultation with the servicing HR office (either the HRO or a member of the Employee Relations staff) and SOL:

(a) May use a manager, supervisor, or other appropriate official from either within or outside of the program area or Region, or a contractor from a third party.

(b) Must ensure that the individual conducting the investigation:

(i) Does not have a conflict of interest with either the alleged victim or the alleged harasser,

(ii) Is trained in the skills that are required for interviewing witnesses and gathering facts, and

(iii) Provides a completed Fact Finding Report (FFR).

(3) All investigations must be conducted in accordance with the Department's *Investigator Guide to Conducting Administrative Investigations*.

(4) In some cases, if the alleged harasser admits to everything that was alleged, there is no need to interview witnesses. Management officials should consult with the servicing HRO to determine if additional information is needed and take appropriate corrective action.

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(5) After the investigation is complete, the person conducting the investigation must provide a completed FFR to the manager/supervisor to whom the allegation was sent. The manager/supervisor must review this report and, in consultation with the servicing HRO, give it to the FFR Review Panel (see section 6.10). The FFR must also be sent to SOL for legal review before finalized.

**6.10 How does the Service review and analyze reports from the investigation into allegations of harassing conduct?** The Service will use FFR Review Panels to review the FFR and act as proposing unit for disciplinary actions.

**A. FFR Review Panel composition:**

(1) The Service Executive Anti-Harassment Team establishes two panels of three supervisory employees each.

(2) Members must:

(a) Be senior-level employees (GS-14 or above), and

(b) Serve 6- to 12-month terms.

(3) Membership will rotate so each panel will have an experienced member at all times.

(4) HQ HRO staff will train members at the beginning of their terms, and the HQ HR Officer and other servicing HR Officers will serve as their advisors.

**B. Processing FFRs:**

(1) When an FFR is issued, the HR Specialist convenes an FFR Review Panel and provides an overview of the allegations.

(2) The panel reviews and analyzes the report and consults with the HR Specialist and SOL to determine if misconduct occurred.

(3) If immediate action is needed (e.g., removing an alleged harasser from the work site), there is no need to wait for the panel's assessment.

**6.11 How does the Service determine penalties for findings of harassing conduct?**

**A.** If the FFR Review Panel determines that misconduct occurred and that discipline is warranted, the panel will serve as the proposing official. The panel will work closely with the HR Specialist and SOL on determining the penalty. The deciding official will be identified in the proposal letter. In most cases, this will be a manager in the employees' chain of command. Deputy Regional or Assistant Directors have the authority to appoint a deciding official outside the chain of command, if needed.

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**B.** Within the Service, allegations of misconduct of a sexual nature have a starting point for discipline for a first offense of a 5-day suspension. Other charges have varying levels of discipline, and the panel will rely on the Department's Table of Penalties to propose penalties. As with all allegations of misconduct, determining charges and any penalty for discipline requires the application of reasonable judgement.

**(1)** The determination must follow 370 DM 752 for policies and procedures and include an analysis of the Douglas factors for assessing penalties.

**(2)** Penalties up to removal are within the range in the Table of Penalties for a first offense.

**(3)** If the situation warrants, the penalty may be mitigated below a 5-day suspension, but that mitigation must be documented.

## **TRACKING AND OTHER INFORMATION**

**6.12 What are the tracking requirements?** The servicing HRO must:

**A.** Track information related to any allegations of harassing conduct in separate case files and in accordance with established records management policies.

**B.** Monitor and record the status of allegations, including final resolution, in the appropriate tracking system approved by the Department's Office of Human Resources. This information helps the Department monitor compliance with policy, understand trends related to harassing conduct, and ensure swift resolution of complaints.

**6.13 How can employees get more information about the Service's policy and procedures on harassing conduct?** If you have a question about Service policy or the procedures in this chapter, contact HQ HRO or your Regional HRO.

/sgd/ Margaret E. Everson  
PRINCIPAL DEPUTY DIRECTOR

Date: March 19, 2019

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03/19/19

**PERSONNEL RELATIONS AND SERVICES**

New (previously, some parts of this policy were in 060 FW 7, which was rescinded 4/16/18)