



Work Environment Survey
Corrective and Preventive Action Plan
(WES-CAPA Plan)

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Introduction

In August 2016, the Department of the Interior (DOI), through the Federal Consulting Group (FCG), engaged a contractor to conduct an assessment of harassing and/or assault behaviors in the DOI workplace, both in terms of its prevalence and the climate that would allow or tolerate such behavior. This project was later broadened in scope to include all forms of harassment¹.

The Work Environment Survey (WES) was administered during the period of January 9 to March 5, 2017, to all DOI personnel employed as of December 10, 2016. The survey was designed to assess workplace conditions that DOI employees experience, including the prevalence and context of all forms of harassment and, specifically, sexual harassment.

For the Bureau of Ocean Energy Management (BOEM), 269 of 585 employees completed questionnaires (46% of the BOEM workforce). Employee population characteristics were used to estimate population parameters for BOEM in order to obtain a representative view of the entire bureau's workforce. The percentages included in the results of the WES are based on those estimated population parameters.

Detailed analysis of BOEM's survey results indicate that approximately 33.6% of BOEM employees experienced one or more forms of harassment and/or assault related behaviors in the 12 months preceding the survey. More specifically:

- 18.9% experienced harassing behaviors based on their age
- 6.1% experienced harassing behaviors based on their racial or ethnic background
- 6.6% experienced harassing behaviors based on their religious beliefs
- 3.9% experienced harassing behaviors based on a perceived or actual disability
- 3.1% experienced harassing behaviors based on their sexual orientation
- 17.5% experienced harassing behaviors based on their gender
- 8.5% experienced sexual harassment
- 1.89% experienced sexual assault related behaviors

The experiences of these BOEM employees is counter to the values and expectations held by the Bureau's leadership. BOEM maintains a zero-tolerance culture and policy towards harassment of any type. As a result, the BOEM Work Environment Survey Corrective and Preventive Action (WES-CAPA) Plan shall immediately be implemented in order to combat the types of experiences indicated in the WES results.

¹ For the purposes of this document, harassment includes discrimination and assault behaviors.

Goals and Objectives

The goals and objectives of this CAPA Plan are to help eliminate all forms of harassment within the bureau. The problems identified in the WES shall be addressed, rectified and proactively prevented as the bureau moves forward with the implementation of the WES-CAPA Plan.

Plan Summary

The bureau intends to take a number of measures to facilitate the elimination of harassment. These actions address:

- A. Harassment in the Workplace
- B. Workplace Leadership and Accountability
- C. Educational Prevention Policies and Procedures
- D. Anti-Harassment Compliance and Workplace Civility Training
- E. General Support Needs

Each grouping of actions will have an assigned responsible party, a completion date and success metric (where measureable and practicable).

Given the problems identified in the WES, BOEM has determined that engaging an external vendor possessing the skillset to assist with the CAPA Plan implementation is the most effective approach to prevent harassment in the future. Of the actions outlined in the next section, Item I.2 reflects this action. The detailed activities listed under Item I.2 provide the bureau's perspective on what could be performed by the vendor. BOEM will work closely with the vendor to explore any and all options the vendor deems appropriate to address harassment.

Corrective and Preventive Actions

The action items below detail how BOEM plans to address the results of the WES regarding the responsible parties, metrics, completion dates and other details can be found in the Appendix.

- I. Actions Related to Harassment in the Workplace
 - 1. Meet with the Department's WES team to better understand the results of the survey and review recommendations and best practices for inclusion in BOEM's CAPA Plan.

2. Engage FCG to develop a solicitation² for an outside expert to:
 - Review the results of the survey
 - Develop location-based focus groups to explore the data and identify unique problems at each location
 - Develop detailed, scheduled, measurable actions to combat and prevent harassment
 - Provide best practice recommendations
 - Provide (or recommend) targeted "good/effective" training plans for supervisors and employees
 - Conduct a follow-up survey within BOEM to determine the effectiveness of the CAPA Plan over the 12-month period following implementation of the Plan.
3. Communicate the results of the WES to all employees to raise awareness.

II. Actions Related to Workplace Leadership and Accountability

4. Provide a culture of awareness by requiring managers to review the bureau's anti-harassment policy with staff and obtain sign-off indicating that the policy has been explained and understood.
5. Require managers and supervisors to take the following online training courses in DOI Learn:
 - Sexual Harassment Prevention for Federal Managers
 - Compliance Short: Preventing Harassment and Promoting Respect
 - Compliance Short: Preventing Harassment and Promoting Respect 2
 - Compliance Impact: Harassment – It's No Joke
 - Compliance Expert: Harassment – A Case Study

III. Actions Related to Harassment Prevention Policies and Procedures

6. Issue all-employees communications related to harassment prevention (town halls/all employees meetings/messages from senior managers, stories, did you know, what to do, etc.) in an effort to enlighten and educate employees.
7. Review and revise the bureau's anti-harassment policy and procedures to include the support and tools available for supervisors, victims, and witnesses to harassment, responsibilities and the consequences.

² It should be noted that the efforts undertaken for this action item will span many of the high-level action areas referenced in this document.

- IV. Actions Related to Anti-Harassment Compliance and Workplace Civility Training
8. Require all non-supervisory employees to take the following online training courses in DOI Learn:
- Sexual Harassment Prevention for Federal Employees
 - Compliance Short: Preventing Harassment and Promoting Respect
 - Compliance Short: Preventing Harassment and Promoting Respect 2
 - Compliance Impact: Harassment – It's No Joke
 - Compliance Expert: Harassment – A Case Study
9. Provide bureau-wide anti-harassment policy material and resources to new employees during New Employee Orientation sessions. Include the policy and supporting material in the New Employee Orientation packet when entering on duty.
- V. Actions Related to General Support Needs
10. Enroll the Bureau in the Department's Ombuds Program and establish a BOEM Ombudsman.

Verification of CAPA Plan Effectiveness

As part of the engagement with FCG, BOEM will include an option to have FCG administer a second WES at a future date, subsequent to the completion of the CAPA Plan (listed in I.2 above).

This will allow BOEM to review and compare both the raw and statistically weighted data from each survey. The results of this comparison will aid in determining the effectiveness of the CAPA Plan and whether additional corrective or preventive actions are necessary.

Having the same vendor re-survey the bureau will allow BOEM to utilize the same survey questions and manner of delivery. This methodology ensures consistency in the data and provides for an accurate comparison of responses before and after the CAPA Plan completion.

WES-CAPA Plan Approval

Walter Cruickshank
Acting Director, Bureau of Ocean Energy Management

Appendix: Corrective and Preventive Actions – Detailed View

Task #	Task	Lead	Measure	Due Date	Status
1	Meet with the Department's team to better understand the results of the survey and review recommendations and best practices for inclusion in BOEM's CAPA plan.	OBPC	N/A	Dec-17	Complete
2	Engage FCG to develop a solicitation for an outside expert to: <ul style="list-style-type: none"> - Review the results of the survey - Develop detailed, scheduled, measurable actions to combat and prevent harassment - Develop location-based focus groups to explore the data and identify unique issues at each location - Provide best practice recommendations - Provide (or recommend) targeted "outside-the-box" training plans for supervisors and employees - Optional: conduct a follow-up survey within BOEM to determine the effectiveness of the CAPA over the previous 12 months 	OBPC	TBD	FY19 Q2-Q3	Initiate
3	Communicate the results of the WES to all employees to raise awareness.	PA	N/A	Jan-17	Active
4	Provide a culture of awareness by requiring managers to review the bureau's anti-harassment policy with staff and obtain sign-off indicating that the policy has been explained and understood.	OBPC	100% Completion	FY18Q3	Plan
5	Issue the following online training course from DOI Learn to Managers and Supervisors: <ul style="list-style-type: none"> - Sexual Harassment Prevention for Federal Managers - Compliance Short: Preventing Harassment and Promoting Respect - Compliance Short: Preventing Harassment and Promoting Respect 2 - Compliance Impact: Harassment - It's No Joke - Compliance Expert: Harassment – A Case Study 	OBPC	100% Completion	FY18Q2-Q4	Plan

Task #	Task	Lead	Measure	Due Date	Status
6	Issue all-hands communications related to harassment prevention (town hall/all hands/messages from senior managers in either one email and/or over time, stories, did you know, what to do, etc.) in an effort to enlighten and educate employees.	PA	N/A	FY18Q2	Plan
7	Review and revise the bureau's anti-harassment policy and procedures to include the consequences, responsibilities, support and tools available for supervisors, victims, and witnesses to harassment and discrimination.	OBPC	N/A	FY18Q2-Q4	Plan
8	Issue the following online training courses from DOI Learn to all non-supervisory employees: <ul style="list-style-type: none"> - Sexual Harassment Prevention for Federal Employees - Compliance Short: Preventing Harassment and Promoting Respect - Compliance Short: Preventing Harassment and Promoting Respect 2 	OBPC	100% Completion	FY18Q2-Q4	Plan
9	Provide bureau-wide anti-harassment policy material and resources to new employees during New Employee Orientation.	OBPC	N/A	FY18Q3	Plan
10	Enroll in the Department's Ombudsman program and establish a BOEM Ombudsman.	OBPC	N/A	FY18Q2	Active