

**Year 2 Public Description of Work for
Action Collaborative on Preventing Sexual Harassment in Higher Education**

National Oceanic and Atmospheric Administration (NOAA)
Office of Workplace Violence Prevention and Response (WVPRO)

**Improvements to NOAA's Sexual Assault Sexual Harassment (SASH)
Policy (continued)**

Relevant Rubric Area(s):

Prevention: Improved Policies (Rubric Item 10)

Description of Work:

Background.

By way of history, in 2018, NOAA developed and authored its original Sexual Assault/Sexual Harassment (SASH) policy ([NAO 202-1106](#)) as a result of legislation calling for the implementation of a policy that addressed training, victim advocacy, and Human Resource (HR) actions revolving around these issues. While the original SASH policy honored legislative intent, leadership supported expansion and clarification of certain language therein.

In Year 1, NOAA proudly shared accomplishments tied to their newly developed policy (see [here](#) for Year 1 submission). Of note, NOAA's policy addressed annual training requirements on SASH prevention and awareness, as well as bystander intervention. In addition, the policy established a SASH council comprised of various stakeholders and leaders. Because the WVPR program was relatively new, the policy established reporting mechanisms and advocacy resources, as well as workplace flexibilities for those impacted by SASH, such as a workplace transfer or the transfer of the alleged offender.

Policy Updates.

The SASH policy was reviewed in 2019, however, in 2021, the policy was reviewed again and as a result, will be expanded even further. With the addition of various subject-matter experts to the full-time Workplace Violence Prevention and Response team, the SASH policy was reviewed and WVPR proposed modifications to encompass language that:

- Assures a victim-centric, trauma-informed response capability exists within NOAA.
- Creates core competencies and professionalizes NOAA's robust cadre of dedicated volunteer assistance liaisons.
- Clarifies response mechanisms for contractors, visitors and other affiliates.
- Updates the discipline process for incidents of harassment and assault.
- Acknowledges the intersection of DEIA and SASH in the NOAA workforce's experiences.

GAO Audit.

The NOAA WVPR program was audited by the GAO this summer. The audit, entitled: “SEXUAL ASSAULT AND HARASSMENT: NOAA Has Made Substantial Progress in Prevention and Response, but Could Further Improve its Processes (GAO-21-560)” reflected six recommendations, most of which are resolved or in the process of being resolved. The audit recommended various updates relative to the SASH policy, to wit:

- “The administrator of NOAA should ensure that future updates to the agency’s sexual harassment and sexual assault prevention and response policy are consistent with all relevant legal requirements.”
- “The administrator of NOAA should implement a mechanism requiring oversight by senior agency leaders of all disciplinary actions involving misconduct related to sexual assault and sexual harassment before such actions are finalized.”
- “The administrator of NOAA should require that training for supervisors and managers include critical NOAA-specific information, such as how to report allegations up the chain of command, how to identify and minimize potential risk factors, explanations of NOAA’s confidentiality rules, and the consequences for failing to fulfill their supervisory responsibilities.”
- “The administrator of NOAA should ensure that the central tracking system being developed will collect consistent data and appropriately document the number and type of incidents of sexual assault and harassment across complaint systems.”

In response, NOAA informed the GAO that the SASH policy is or will be modified to address these recommendations. Notably, NOAA is actively collaborating with stakeholders on modifying the standing policy to incorporate all relevant legal requirements, to include the elevation of disciplinary oversight and training for managers and decision makers on their roles and responsibilities tied to SASH. In addition, NOAA contracted a company that has created evidence-based training at various echelons that will not only highlight the existing programs and processes, but also provide tools to address risk factors and bystander intervention methods. Lastly, NOAA is currently developing a database that will streamline case data for reporting to Congress, as well as to provide consistent trend data to NOAA leadership and employees. This data will also allow NOAA to engage in meaningful prevention efforts.

Due to the various agencies, unions and stakeholders which are required to review the policy, NOAA anticipates the updated policy will be released in early 2022. With NOAA having consulted an independent agency specializing in sexual harassment for the current version of the policy, the biennial external review will ensure the SASH policy remains relevant, inclusive and compliant with evolving legislation.

NOAA’s SASH policy evolution emphasizes that sexual assault, sexual harassment and other inappropriate behaviors are not only unwelcome, but constitute a violation of research integrity. In a STEM organization such as NOAA, this understanding is vital to the credibility of our entire organization.

Website for further information (if applicable): <https://www.noaa.gov/workplace-violence-prevention-response-program>

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