



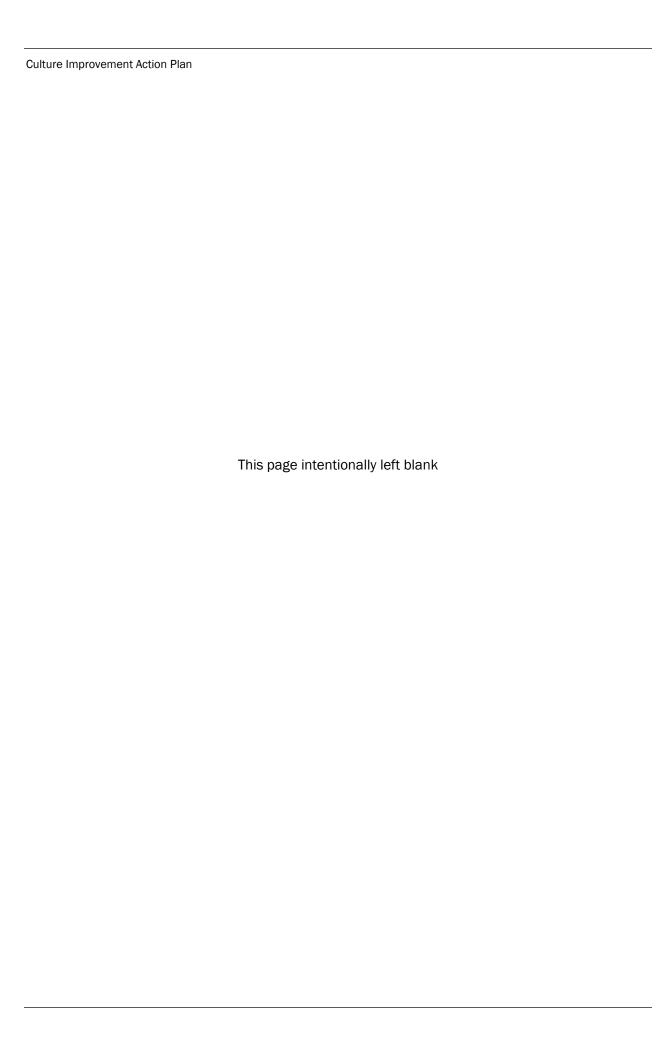




Culture Improvement Action Plan

December 2020





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Purpose

A commitment to a workplace free of harassment and discrimination is fundamental to living our core values now and in the future. It is incumbent upon us to understand our employee's lived experiences in the workplace, and build and sustain an environment of professionalism, dignity, and respect. Though these findings are from a survey taken more than 18 months ago, it is not acceptable that our employees felt this way then, and it is certainly not acceptable now.

This "Culture Improvement Action Plan" builds upon Agency accomplishments and achievements since the first reports of harassment and misconduct. While we collectively worked hard, instituted programs, and improved policies that address the very issues identified in the RAND survey, we are committed to continuous improvement.

The plan is designed to:

- Increase employee awareness of RAND survey results
- Provide transparent communication of workforce culture objectives, programs, and improvements and associated implementation timelines.
- Demonstrate continued leadership commitment to our core values

Background

1. Responding to Allegations

In 2018, FEMA officials launched an internal investigation based on allegations of sexual harassment by a senior executive at the agency. The Washington Post, the Wall Street Journal, and the New York Times all reported the story of the alleged harassment and misconduct in 2018, launching FEMA into the national headlines and spotlight. It would be the first of several investigations into alleged inappropriate sexual behavior by FEMA senior executives with subordinate employees, some of whom subsequently resigned or were terminated.

The Agency announced additional steps to address sexual harassment inside the organization, to include mandatory training, counseling services, and standing up an Office of Professional Responsibility (OPR). Another step included the procurement of services from an outside company (RAND) to conduct an employee survey on workplace harassment and discrimination.

FEMA responded to media inquiries with complete transparency regarding the initial investigation, along with steps to address sexual harassment inside the organization. Those immediate efforts included mandatory training, counseling services, and calling for the creation of the Office of Professional Responsibility (OPR). Another step included procurement of services from RAND to conduct an employee survey on workplace harassment and discrimination.

2. Assessing the Culture

In April and May 2019, at FEMA request, the Homeland Security Operational Analysis Center (HSOAC) fielded a survey designed to estimate the annual prevalence of workplace harassment and discrimination at FEMA and to assess employee perceptions of leadership and workplace climate objectively. To provide a more complete description of the types of civil rights violations experienced by FEMA employees, the survey assessed sexual harassment, gender-based harassment, racial/ethnic harassment, gender discrimination, racial/ethnic discrimination, and leadership and workplace culture. Civil rights violation is an umbrella term that includes harassment and discrimination based on any protected class.

All 19,917 FEMA personnel were invited to participate, and 8,946 completed the survey (44.9 percent response rate). Responses were weighted to represent the Agency population. The survey results identified areas in need of improvement and will help guide FEMA leadership decisions about programming and policy responses.

The survey discovered that civil rights violations were common in the FEMA workplace with an estimated 29% of respondents categorized as experiencing a sex- or race/ethnicity-based civil rights violation in the past year. Overall, 1 in 5 FEMA employees were categorized as having experienced gender-based or sexual civil rights violations in the past year: roughly 1 in 4 women and roughly 1 in

7 men. Approximately 1 in 5 FEMA employees were categorized as having experienced racial/ethnic civil rights violations in the past year.

CIVIL RIGHTS VIOLATIONS
WERE COMMON IN FEMA

29%

Experienced a sex- or race/ethnicity-based civil rights violation in the previous year

SEX- OR GENDER-BASED VIOLATIONS

20.0%

Experienced a sex- or gender-based discrimination or harassment in the previous year

RACE OR ETHNICITY-BASED VIOLATIONS

18.4%

Experienced a racial or ethnic-based discrimination or harassment in the previous year

The survey also found that mistrust in senior leadership is a problem at FEMA. For those who reported discrimination to their supervisor, most were either neutral about or dissatisfied with FEMA's response to the complaint. This could be because they perceived that supervisors took no action in response to reports of discrimination. In addition, 42.1% of respondents were encouraged to drop the issue.

Men had more positive perceptions of the work environment at FEMA than women did, generally. This was true for perceptions of supervisor and FEMA leader response to sexual harassment and of the general work environment climate. In addition, White or Hispanic employees had more positive perceptions of the environment than African American employees did.

3. Improving the Culture

In response to the 2018 internal investigation, FEMA embarked on a comprehensive initiative to reemphasize importance of FEMA core values and enhance cultural wellness. The Agency developed and disseminated Pub 1, an internal publication intended to promote innovation and performance in achieving the FEMA mission, all while promoting unity, guiding professional judgement, and enabling each of us to fulfill our responsibilities. Pub 1 defines FEMA core values, marking transition from a state of response to one of accountability.

FEMA leaders took additional steps to improve workplace climate and culture, including establishment of the Office of Professional Responsibility (OPR). In October 2019, OPR stood up to investigate allegations of misconduct and harassment in a consistent, timely, and transparent manner. To empower OPR, FEMA trained all investigators in using victim-based approaches to investigate sexual harassment claims and increased the number of female investigators from zero to seven.

Additionally, FEMA provided anti-harassment/ civil treatment trainings for all employees, engaged employees in "Lunch with a Leader" events, created and delivered the "Know Your Rights and Responsibilities" brochure to all employees as an easy and ready reference regarding where to go for concerns, and hosted senior leadership level townhalls promoting open and honest dialogue with employees.

Living Our Values

Our core values are **compassion**, **fairness**, **integrity**, and **respect**. They are the heart of what our Agency and our employees stand for and represent. These values form the foundation of who we are, what we believe, and who we want to be. We are committed to these core values, which apply to our interactions with everyone – survivors, colleagues, partners – every single day.

Compassion	Integrity	Fairness	Respect
We are understanding, empathetic, and inclusive as we support fellow employees, partner organizations, individuals, and communities.	We earn trust by being accountable, present, honest, and dependable. Because we are the face of FEMA, our conduct – both on and off duty – matters.	We are consistent in our commitment to help others.	We are committed to active listening and welcome diversity of thought, opinion, and background. Together, we are stronger.

1. Compassion

Compassion is expression of our care for others. We are understanding, empathetic, and inclusive as we support fellow employees, partner organizations, individuals, and communities.

FEMA employees demonstrate compassion by:

- Showing empathy to a disaster survivor, and providing relevant information and direction
- Supporting a colleague by listening or assisting with a project, or when they are coping with a personal or family emergency
- Exercising patience when explaining our processes to one of our partners

2. Fairness

Fairness is treating everyone impartially, offering unbiased and consistent assistance, and ensuring equal access to resources and tools. We are consistent in our commitment to help others.

FEMA employees demonstrate fairness by:

Providing programs and services that ensure equal access for survivors with disabilities

- Treating all colleagues equitably, professionally, and consistently
- Creating a standardized review process for stakeholder requests that ensure all applicants are considered equally

3. Integrity

Integrity encompasses our responsibility as stewards of federal resources, services, and programs, and our conduct as trusted professionals. We earn trust by being accountable, present, honest, and dependable. Because we are the face of FEMA, our conduct – both on and off duty – matters.

FEMA employees demonstrate integrity by:

- Applying the highest levels of honesty and transparency in everything we deliver to those we serve
- Acting and standing up for our colleagues when we see something wrong by doing what is necessary and appropriate to make it right
- Holding ourselves accountable so that our partners can rely on us to be truthful and to follow through

4. Respect

Respect is the practice of acknowledging the value of the people we work with and serve. We are committed to active listening and welcome diversity of thought, opinion, and background. Together, we are stronger.

FEMA employees demonstrate respect by:

- Treating each survivor with dignity and allowing them to maintain their personal autonomy and self-determination
- Fostering a healthy, safe, and positive environment where managers and staff enjoy working together
- Building trusted relationships with partners in which we value different points of view and listen to one another

RAND Recommendations

Behind RAND findings, the report also speaks to a FEMA culture where many employees do not trust their supervisors or their senior leaders, see significant barriers to reporting, and many employees who filed a complaint are dissatisfied with the response they receive. To address these issues, the RAND report offers six recommendations to address systemic deficiencies and to improve the FEMA culture.

The recommendations are:

- 1. Ensure that prevention efforts address all problematic behaviors.
- 2. Explore differences in culture and climate between offices that had low rates of civil rights violations and offices that had higher rates.
- 3. Explore interventions with leadership at all levels to ensure that all understand how best to handle harassment and understand their responsibility to address it.
- 4. Reduce barriers to reporting.
- 5. Increase accountability and transparency in dealing with harassment and discrimination reports at all levels of leadership.
- 6. Continue monitoring harassment and discrimination in the workforce

1. Ensure that prevention efforts address all problematic behaviors.

RAND notes that while the motivation for the survey was sexual harassment, future FEMA mitigation and prevention commitments must also address sexist or offensive comments, as well as racial-, gender-, and ethnicity-based mistreatment. FEMA needs to ensure its policies and practices support fair, equitable, and a safe workplace, consistent with our core values.

2. Explore differences in culture and climate between offices that had low rates of civil rights violations and offices that had higher rates.

Through this recommendation, RAND suggests FEMA examine why some offices had lower rates of civil rights violations than others. FEMA should perform a systematic review and identify and promote best practices, as appropriate, then socialize them broadly.

3. Explore interventions with leadership at all levels to ensure that all understand how best to handle harassment and understand their responsibility to address it.

The third RAND recommendation addresses leader engagement and suggests a more visibly united front at all levels of leadership would send a clearer signal to employees about what types of behavior are appropriate and acceptable.

4. Reduce barriers to reporting.

In the fourth recommendation, RAND notes that there are conditions that may have prevented FEMA employees from reporting harassment and discrimination. Most notably, FEMA lacked employee training and education about the offices and processes to promote employee reporting. The most common barrier cited in the RAND survey, however, for not reporting harassment is that employees did not believe the Agency would take appropriate remedial action. Lastly, FEMA employees reported that they held concerns of being labeled a "trouble-maker" or feared retaliation for reporting complaints.

5. Increase accountability and transparency in dealing with harassment and discrimination reports at all levels of leadership.

In their fifth recommendation, RAND notes less than half of employees who reported harassment or discrimination were satisfied with the response and remedial action taken. Employees believe agency leaders at all levels need to be accountable to build trust in the system.

6. Continue monitoring harassment and discrimination in the workforce

The final RAND recommendation emphasizes importance of sustained surveillance of employee observations and sentiment as a direct means to routinely assess the effect of the Agency's intervention and mitigation measures.

Action Plan

The RAND report was a snapshot in time, more than a year and a half ago. In the time since, FEMA has worked to build and institute programs and improve policies that address the very issues this survey confirmed as areas for improvement. Important highlights include the following:

- In October 2019, OPR stood up to ensure expeditious, fair, and objective investigation of allegations of misconduct and harassment.
- FEMA required anti-harassment training for all employees. All senior executives were trained, and trainers continue to offer anti-harassment classes for all staff.
- FEMA Administrator and Chief of Staff conducted weekly or bi-weekly meetings with the Office of Equal Rights, Labor Employee Relations, and Office of Professional Responsibility to discuss matters relating to employee misconduct and accountability.
- Allegations that OCCHCO and OER case mishandling relating to hiring and promotion processes were reviewed and resolved following FEMA examination.
- FEMA released Pub 1 as its capstone doctrine, helping all employees to understand our role in the community, with an emphasis on living our core values of compassion, fairness, integrity and respect, and is designed to foster a supportive, healthy, and productive environment throughout our organization.
- FEMA offered "Safe Space" training by the <u>Rape</u>, <u>Abuse and Incest National Network (RAINN)</u> to staff beginning in the fall of 2019.
- Senior leaders held town halls in their organizations to discuss our core values.

While actions taken in the past 18 months are positive steps in providing a work environment free from harassment and misconduct, we recognize our work is not done. Therefore, considering RAND's findings and recommendations, FEMA identified discrete activities – as an Action Plan – to occur in the next three, six, and twelve months to address challenges uncovered by the survey of FEMA employees. These FEMA activities reflect its commitment to continual improvement and are organized into the following six focus areas: Engagement and Advocacy; Training and Education; Messaging and Communications; Employee Resources; Performance and Accountability; and Monitoring and Assessment. It's important to point out each activity will take additional work by FEMA offices that is most relevant and influential to secure proper implementation and sustainment.

While these focus areas characterize activities to change FEMA culture and represent commitments to employees, they do not correspond one-for-one with each RAND recommendation. Each focus area and the associated activities addresses multiple RAND recommendations for improvement, as depicted in Figure 1:

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Figure 1: Action Plan Focus Areas and Ran Report Recommendations Crosswalk

For each activity to address report findings or RAND recommendations, there is a recommended Lead FEMA component or office and associated 3-month, 6-month, and 12-month implementation timeframe.

1. Engagement and Advocacy

FEMA will pursue a fresh round of leader engagements to reach out to the workforce and advocate for our core values. Following release of the Rand findings, the Administrator will conduct a Town Hall with FEMA employees to promote and walk through this Action Plan. Additionally, a dedicated campaign of virtual roadshows, for which planning is now underway, will continue at headquarters, within each region, and in the field.

1.1. Activity within 3 months

Activity: Convene Senior Leader virtual "Town Halls" and "Listening Tours."

 Lead FEMA Components: Office of the Administrator, Office of External Affairs, Office of Professional Responsibility, Office of Equal Rights, Office of the Chief Component Human Capital Officer

1.2. Activity within 6 months

Activity: Make Office of Professional Responsibility and Office of Equal Rights virtual "roadshows" available for directorates, program offices, and Regions.

Lead FEMA Components: Office of Professional Responsibility, Office of Equal Rights

1.3. Activities within 12 months

Activity: Empower and resource FEMA Employee Resource Groups to build advocacy for employees related to core values and anti-harassment. Provided with the necessary resources, FEMA Employee Resource Groups can act as advocates and engage peers in key segments of our workforce in a way that our leaders cannot.

Lead FEMA Component: Office of the Chief Component Human Capital Officer

Activity: Promote Leader "TED" Talks for all Directorates, Program Offices, and Regions.

o Lead FEMA Components: Office of the Administrator, Office of External Affairs

Activity: Initiate Guest speaker series

Lead FEMA Components: Office of External Affairs, FEMA Employee Resource Groups

2. Training and Education

The RAND report identifies training and education as an opportunity to help the workforce, agency leaders, and supervisors to address workplace harassment and the other challenges within FEMA culture. While time is limited during new employee onboarding, FEMA will educate all new staff on core values and specifically address our commitment to a workplace free of harassment and discrimination. FEMA will recommend that we identify and set aside specific day/time for all supervisors to complete training. Additionally, within six months FEMA will pursue revision of the curricula of FEMA Fellows and Future Leaders and other leadership development programs.

2.1. Activities within 3 months

Activity: Address during new employee onboarding and orientation.

 Lead FEMA Component: Office of the Chief Component Human Capital Officer/ Chief Learning Officer

Activity: Conduct supervisor "stand-down" to complete training.

Lead FEMA Components: Office of the Chief Component Human Capital Officer,
 Office of Professional Responsibility, Office of Equal Rights

2.2. Activity within 6 months

Activity: Revise curricula of academic and leadership development programs.

Lead FEMA Component: Office of the Chief Component Human Capital Officer/
 Chief Learning Officer

3. Messaging and Communications

Messaging and Communications is of course critical to each of our focus areas, but FEMA will continue to pursue a comprehensive rollout of the RAND report and its recommendations. FEMA will draft External Affairs Guidance that describes background, and activities complete and/or underway, talking points for employees and supervisors, as well as Frequently Asked Questions (FAQs), as well

as a supplementary rollout of this Action Plan. FEMA will address fair workplace themes via a "30-Second Thursdays" and new content dedicated in each edition of the FEMA Weekly released each Wednesday. Within six months, FEMA will initiate a new "Living our Values" podcast, while reenvisioning its internal communications campaign to reinforce fresh messaging.

3.1. Activities within 3 months

- Activity: Rollout RAND Report findings and recommendations.
 - Lead FEMA Components: Office of External Affairs, Office of Professional Responsibility, and
 Office of Equal Rights
- Activity: Roll out "Culture Improvement Action Plan".
 - Lead FEMA Components: Office of the Administrator, Office of External Affairs
- Activity: Reinitiate "30-Second" Thursdays and create "FEMA Weekly"/ "FEMA Bulletin" content
 - Lead FEMA Components: Office of the Administrator, Office of Professional Responsibility, and Office of Equal Rights

3.2. Activities within 6 months

- Activity: Initiate "Living our Values" FEMA Podcast series.
 - Lead FEMA Component: Office of External Affairs
- Activity: Build and sustain internal communications program.
 - Lead FEMA Components: Office of External Affairs, Office of Professional Responsibility,
 Office of Equal Rights, Office of the Chief Component Human Capital Officer

4. Employee Resources

FEMA will develop a central "landing page" on the FEMA intranet to serve as a one-stop shop for employees looking for resources. This content will be current and consistent with the content specifically owned and managed by individual program offices. Content, as appropriate, will link directly to OER and OPR. Similar to "Pub 1" and "FEMA Forward," this site will feature key messaging, Frequently Asked Question, survey results and statistics; case studies, best practices and other relevant information.

4.1. Activity within 3 months

- Activity: Develop and maintain "one-stop shop" intranet site.
 - Lead FEMA Components: Office of Professional Responsibility, Office of Equal Rights,
 Office of External Affairs, Office of the Chief Component Human Capital Officer

5. Performance and Accountability

Fewer than half of employees who reported discrimination or harassment are satisfied with the response and many are left with the impression that nothing is done. FEMA, therefore, must dedicate itself to improving agency processes to ensure timely resolution of employee complaints and routine reporting to enhance employee situational awareness. FEMA will further codify its commitment to a workplace free of harassment and discrimination by integrating a specific priority into the Administrator's Annual Planning Guidance (APG). To that end, FEMA will ask that the Human Capital Governance Board work to develop corresponding objectives and performance measures that can be used in the performance plans of our Senior Executives and, ultimately, by all supervisors.

5.1. Activities within 3 months

- Activity: Engage Administrator and Chief of Staff on employee misconduct, harassment, and accountability matters.
 - Lead FEMA Components: Office of Equal Rights, Office of the Chief Component Human
 Capital Officer/ Labor Employee Relations, Office of Professional Responsibility.
- Activity: Report disciplinary infractions on OCCHCO SharePoint and quarterly in the "FEMA Weekly" to inform and maintain employee situational awareness.
 - Lead FEMA Components: Office of Equal Rights, Office of the Chief Component Human Capital Officer, Office of External Affairs.
- Activity: Pursue continual improvement of processes to ensure timely resolution (adjudication, decision, notification) of employee complaints and associated disciplinary actions.
 - Lead FEMA Components: Office of Equal Rights, Office of the Chief Component Human Capital Officer/Labor Employee Relations, Office of Chief Counsel
- Activity: Address culture improvement as a priority in 2021 Annual Planning Guidance with objectives and performance measures.
 - Lead FEMA Component: Office of Policy and Program Analysis

5.2. Activity within 6 months

- Activity: Include specific performance measures and targets in SES performance plans to align with Annual Planning Guidance (To be completed by December 31).
 - Lead FEMA Component: Office of the Chief Component Human Capital Officer

6. Monitoring and Assessment

The RAND survey responses are more than a year and a half old and lend themselves to comparison with the 2019 Federal Employee Viewpoint Survey (FEVS) results for potential gap analysis. In the interim, FEMA can update its formal exit interview survey to specifically address challenges. FEMA will meet with those offices that performed higher than others, according to the RAND survey, to uncover and socialize best practices agency-wide. This discovery can directly inform a Barrier Analysis, now underway with OER. Last, FEMA is committed to a follow-on survey or assessment, possibly including focus groups, in the year ahead.

6.1. Activities within 3 months

- Activity: Compare RAND findings to 2019 Federal Employee Viewpoint Survey results.
 - Lead FEMA Components: Office of the Chief Component Human Capital Officer,
 Office of Policy and Program Analysis
- Activity: Update exit interview process.
 - Lead FEMA Component: Office of the Chief Component Human Capital Officer

6.2. Activities within 6 months

- Activity: Conduct "deep-dive" review and analysis of higher-performing offices.
 - Lead FEMA Components: Office of the Chief Component Human Capital Officer,
 Office of Policy and Program Analysis
- Activity: Evaluate as part of barrier analysis.
 - Lead FEMA Component: Office of Equal Rights

6.3. Activity within 12 months

- Activity: Conduct annual Agency-wide climate assessment (follow-on surveys, focus groups)
 - Lead FEMA Component: Office of the Chief Component Human Capital Officer, Office of Chief Counsel/Alternate Dispute Resolution, Office of Equal Rights

Implementation

This Action Plan addresses challenges described, and the six recommendations identified, in the RAND report. While these activities reflect our core values and represent comprehensive commitment to FEMA employees, they are not automatic. They require our collective attention, as well as further agency resourcing and dedicated program planning.

The notional timeline presented below represents the implementation actions outlined in this Action Plan. While implementation timeframes may vary from the projected dates below, it is the Agency's intention to initiate these efforts and encourage its workforce to actively engage in critical cultural improvement actions over the next 12 months.



Lead FEMA components and related program offices must remain committed to these immediate actions in order to ensure FEMA remains a safe workplace free of harassment and discrimination.