



United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

September 10, 2018

OWF POLICY MEMEORANDUM 2018-011

To: Director, Bureau of Indian Affairs
Director, Bureau of Land Management
Director, U.S. Fish and Wildlife Service
Director, National Park Service
Director, U.S. Geological Survey
Commissioner, Bureau of Reclamation

From: Jeffery Rupert - Director, Office of Wildland Fire

Subject: Implementing Procedures for the Department of the Interior (DOI) [Personnel Bulletin 18-01: Prevention and Elimination of Harassing Conduct](#) for DOI employees deployed to fire (or other emergency) incidents.

Background

The Policy Memorandum provides clarification for implementing the DOI [Personnel Bulletin 18-01 Prevention and Elimination of Harassing Conduct](#) policy while employees are deployed on incidents. Harassing conduct prohibited by this policy is defined as:

Unwelcome conduct, verbal or physical, including intimidation, ridicule, insult, comments, or physical conduct, that is based on an individual's protected status or protected activities under this policy, when the behavior can reasonably be considered to adversely affect the work environment; or when an employment decision affecting the employee is based upon the employee's acceptance or rejection of such conduct.

The procedural steps outlined below cover some of the initial management response activities required in Section 7.A-C. of the Personnel Bulletin, with the home supervisor of the employee allegedly engaging in harassing conduct being responsible for taking all further steps.

Policy

The following steps are for immediate use the remainder of 2018 and are subject to revision in 2019.

	Next Steps Taken by Person to Whom Incident is Reported (and other management officials)
If an alleged harassment complaint occurs on an incident and is reported to you on the incident .	<ol style="list-style-type: none"> 1. Put it in writing 2. Acknowledge receipt (within one business day) 3. Notify Incident Commander (IC) (if unable to reach IC, notify next in chain of command) 4. IC notify incident hosting Agency Administrator* 5. Hosting Agency Administrator** notifies Home Unit Agency Administrator (of both the alleged victim and alleged harassing employee). 6. Both the alleged victim and alleged harassing employee home unit notifies respective servicing HR offices (HROs). 7. IC physically separates or demobilizes allegedly harassing employee from alleged victim, as appropriate.
If an alleged harassment complaint occurs on an incident and is reported to you at the home unit	<ol style="list-style-type: none"> 1. Put it in writing 2. Acknowledge receipt (within one business day) 3. Notify reporting employee's Agency Administrator* (if unable to reach Agency Administrator, notify next in chain of command) 4. Agency Administrator receiving complaint notifies incident hosting Agency Administrator 5. Hosting Agency Administrator** notifies IC and assures alleged harassing employee Agency Administrator is notified. 6. Both the alleged victim and alleged harassing employee home unit notifies respective servicing HROs. 7. IC physically separates or demobilizes allegedly harassing employee from alleged victim, as appropriate.
If alleged harassing individual is a contractor and a harassment complaint is reported to you on the incident :	<ol style="list-style-type: none"> 1. Put it in writing 2. Acknowledge receipt (within one business day) 3. Notify IC (if unable to reach IC, notify next in chain of command) 4. IC notify incident hosting Agency Administrator* 5. Hosting Agency Administrator notifies Contracting Officer and alleged victim Home Unit Agency Administrator. 6. Contracting officer notifies Vendor. 7. Alleged victim home unit notifies HRO. 8. IC physically separates or demobilizes allegedly harassing contractor from alleged victim, as appropriate.
If alleged harassing individual is a contractor and a harassment complaint is reported to you at the home unit :	<ol style="list-style-type: none"> 1. Put it in writing 2. Acknowledge receipt (within one business day) 3. Notify reporting employee's Agency Administrator* (if unable to reach Agency Administrator, notify next in chain of command) 4. Agency Administrator receiving complaint notifies incident hosting Agency Administrator. 5. Hosting Agency Administrator notifies IC and Contracting Officer. 6. Contracting officer notifies Vendor. 7. The alleged victim home unit notifies HRO. 8. IC physically separates or demobilizes allegedly harassing contractor from alleged victim, as appropriate.

*Agency Administrator in wildland fire is the official responsible for the management of a geographic unit or functional area. The managing officer of an agency, division thereof, or jurisdiction having statutory responsibility for incident mitigation and management. Examples: NPS Park Superintendent, BIA Agency Superintendent, BLM District Manager, FWS Refuge Manager.

**Agency Administrators should address this policy in Delegations of Authority to ICs. The Delegation should state that ICs will be responsible for following this policy in the event they are notified of alleged harassment on an incident.

Bureau-specific policies are provided for reference:

Bureau of Land Management (internal site): <https://web.blm.gov/internal/wo-500/directives/dir-18/pim2018-021.html>

National Park Service

Director's Order #16E: https://www.nps.gov/policy/DOrders/DO_16E_2018rev.htm

Reference Manual #16E: https://www.nps.gov/policy/DOrders/RM-16E_Signed_2018_04_Combined_508_040218.pdf

Fish and Wildlife Service: <https://www.fws.gov/home/antiharassment/>

Bureau of Indian Affairs:

https://www.bia.gov/sites/bia.gov/files/assets/public/raca/manual/pdf/8%20IAM%204%20Harassment%20Free%20Workplace%20and%20Claims_FINAL_signed_wfooter_508.pdf

US Forest Service: <https://www.fs.fed.us/about-agency/anti-harassment-policy>

cc: Director, United States Forest Service, Fire and Aviation Management
DOI, Office of Human Resources, Division of Workforce Relations

Director,