



NCUA
National Credit Union Administration

Congressional Report on Notification and Federal Employee Antidiscrimination and Retaliation Act

March 2022

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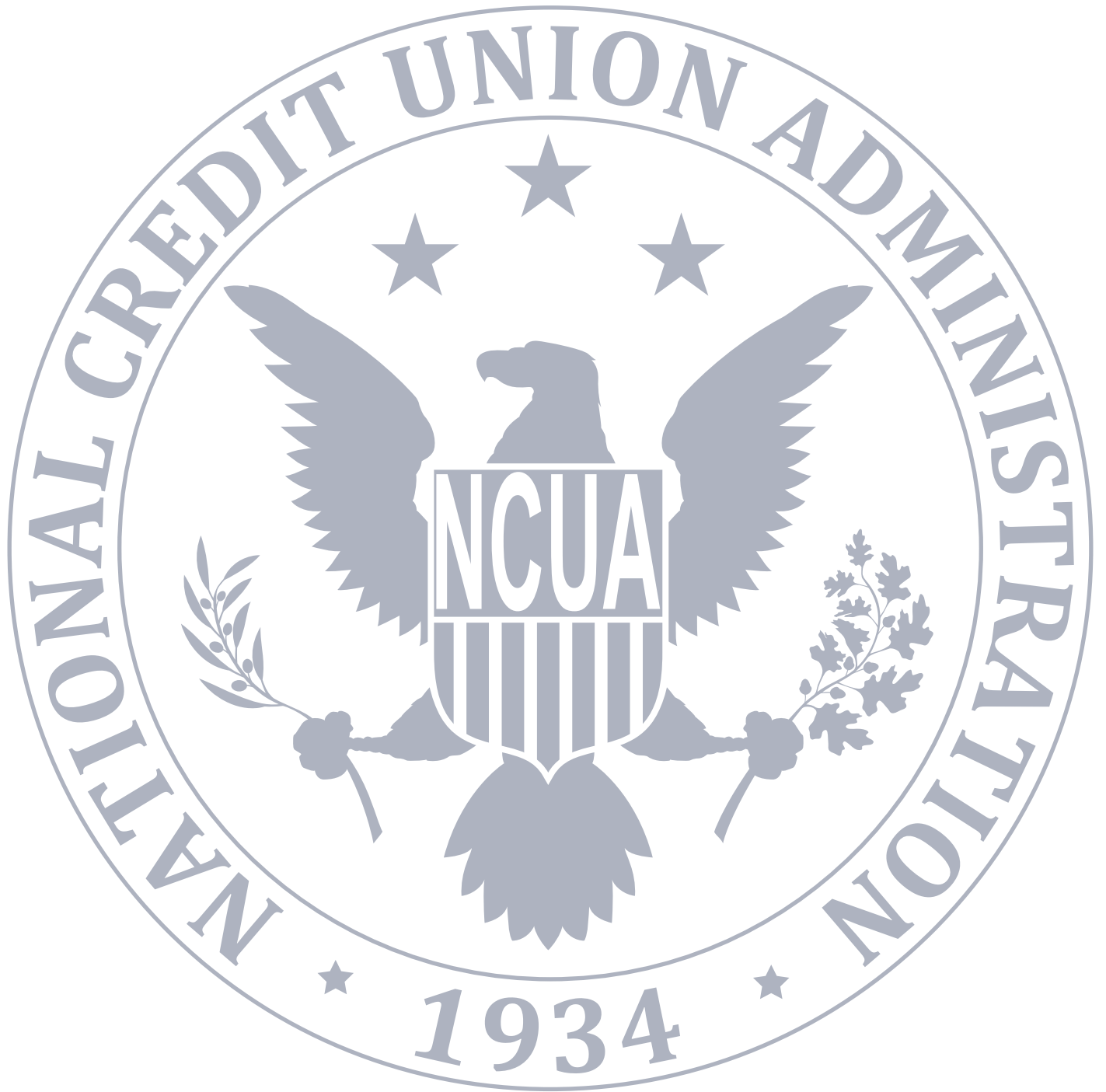


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Introduction

The National Credit Union Administration is the independent federal agency created by the U.S. Congress to regulate, charter, and supervise federal credit unions. With the backing of the full faith and credit of the United States, the NCUA operates and manages the National Credit Union Share Insurance Fund, insuring the deposits of more than 129.6 million account holders in all federal credit unions and the majority of state-chartered credit unions. The NCUA also protects consumers and educates the public on consumer protection and financial literacy issues.

The NCUA values each employee and is committed to creating and sustaining an environment where they can contribute to fulfilling the agency's mission. The NCUA has zero tolerance for discrimination. The agency's policies and procedures are in line with all antidiscrimination laws and merit promotion principles.

The NCUA's Equal Employment Opportunity policy prohibits discrimination based on race, color, religion, national origin, sex (including sexual harassment and sexual orientation), age (40 years and over), disability (mental and physical), genetic information, or reprisal for any protected activity. The agency is also committed to affording employees their rights and protections available under federal antidiscrimination, whistleblower protection, and retaliation laws.

The NCUA Office of Minority and Women Inclusion prepared this report.



Background

The Notification and Federal Employee Antidiscrimination and Retaliation Act of 2002 (No FEAR Act) went into effect on October 1, 2003.¹ The act requires federal agencies to be accountable for violations of antidiscrimination and whistleblower protection laws, and to post certain statistical data relating to federal-sector EEO complaints filed with the agency.

Section 203 of the No FEAR Act requires each federal agency to submit an annual report to Congress. Agencies must report:

- The number of federal court cases that arise under respective areas of law specified in the act in which discrimination was alleged;
- The status or disposition of cases;
- The amount of money required to be reimbursed;
- The number of employees disciplined;
- Any policies implemented related to appropriate disciplinary actions against a federal employee who discriminated against any individual or committed a prohibited personnel practice; and
- An analysis of the data collected with respect to trends, causal analysis, and other forms for analysis.

Section 203 of the No FEAR Act requires federal agencies to submit annual reports to each Congressional committee that has jurisdiction relating to the agency, and to the:

- Speaker of the House of Representatives;
- President Pro Tempore of the Senate;
- Committees on Governmental Affairs of the Senate and Government Reform of the House of Representatives;
- Attorney General;
- Chair of the Equal Employment Opportunity Commission; and
- Director of the Office of Personnel Management.

¹ Public Law 107-174.

Data

1. *The number of cases in federal court pending or resolved in each fiscal year and arising under each of the respective provisions of the federal antidiscrimination laws and whistleblower protection laws applicable to them as defined in 5 C.F.R. 724.102, in which an employee, former employee, or applicant alleged a violation(s) of these laws, separating data by the provision(s) of law involved.*
 - None
2. *(a) The status or disposition of cases described in question (1); (b) the amount of money required to be reimbursed to the Judgment Fund by the agency for payments as defined in 5 C.F.R. 724.102; and (c) the amount of reimbursement to the Fund for attorney's fees where such fees have been separately designated.*
 - (a) None
 - (b) None
 - (c) None
3. *In connection with the cases identified above, the total number of employees in each fiscal year disciplined (reprimand, suspension without pay, reduction in grade or pay, or removal) and the specific nature of the disciplinary actions taken, separated by the provision(s) of law involved.*
 - None
4. *The final year-end data about discrimination complaints for each fiscal year that was posted in accordance with Equal Employment Opportunity Regulations 29 C.F.R. 1614.701, and what follows.*
 - See [Appendix I](#).
5. *Whether in connection with cases in federal court, the number of employees in each fiscal year disciplined in accordance with agency policy. The specific nature—for example, a reprimand—of the disciplinary actions taken must be identified.*
 - None
6. *A detailed description of the agency's policy for taking disciplinary action against federal employees for conduct that is inconsistent with federal antidiscrimination laws and whistleblower protection laws or for conduct that constitutes another prohibited personnel practice revealed in connection with agency investigations of alleged violations of these laws.*
 - The NCUA administers a discipline and adverse action program in accordance with 5 CFR Part 752. Disciplinary actions against employees for conduct that is inconsistent with federal antidiscrimination laws and whistleblower protections, or for conduct which constitutes a prohibited personnel practice, are determined based on the circumstances of each case.

7. ***An analysis of the information described under paragraphs (1) through (6) (in conjunction with data provided to the Equal Employment Opportunity Commission (EEOC) in compliance with part 1614 of title 29 of the Code of Federal Regulations) including:***
 - a) *an examination of trends;*
 - b) *causal analysis;*
 - c) *practical knowledge gained through experience; and*
 - d) *any actions planned or taken to improve the complaint or civil rights programs of the agency.*
 - Analysis provided in the [EEO Complaint Activity Analysis and Training](#) section of this report.
 8. ***For each fiscal year, any adjustment needed or made to the agency's budget to comply with its Judgment Fund reimbursement obligations incurred under 5 C.F.R. 724.103.***
 - None
 9. ***The agency's written plan developed under 5 CFR § 724.203(a) to train its employees.***
 - The NCUA provides staff training on the No FEAR Act as directed by law and by Office of Personnel Management regulations. Every two years, the NCUA disseminates the required No FEAR Act training course in the agency's learning management system. Anti-harassment and other EEO-related training are also provided to employees, as needed, to meet the EEO training requirements. The Division of Training and Development announced the beginning of the training cycle and required all employees to complete training within 60 days. During the 2021 training cycle, 100 percent of NCUA's employees completed the No FEAR Act training.
 - Pursuant to agency policy, the NCUA provides EEO training to new supervisors. The agency also makes EEO training available to all new hires following the orientation process and requires completion of the No FEAR training within 90 days from their hiring date. EEO information is posted on the agency's internal website and is accessible to all employees.
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EEO Complaint Activity Analysis and Training

Trend and Causal Analysis

One formal complaint was filed in fiscal year 2021 by a non-NCUA applicant for employment. This represents a decrease in complaint activity compared to five EEO complaints filed in both fiscal years 2019 and 2020.

The bases and allegation made in the complaint filed in fiscal year 2021 is as follows: complainant alleged discrimination based on race, sex, and age when she was not selected for a position. The complainant requested a hearing before an EEOC administrative judge. The complaint is pending a hearing.

Seven complaints carried over into fiscal year 2021 from prior fiscal years. The status of these complaints is:

- Three complaints are pending EEOC hearings or Final Agency Orders;
- Two complaints were closed by final agency decisions; and
- Two complaints were closed by EEOC hearings.

Over the past ten fiscal years (2012–2021), the bases most frequently alleged by complainants are race (24 cases) and age discrimination (21 cases), followed by reprisal (20 cases). During fiscal year 2021, race, sex, and age discrimination were named as bases in the complaint filed.

Management Commitment to Training

One of the NCUA's strategic priorities is creating a workplace that is inclusive, where all employees are valued and able to contribute to their fullest. The NCUA's leadership remains committed to equal employment opportunity, diversity, and inclusion. EEO and diversity and inclusion policy statements are updated and issued annually to all agency staff. Further, all managers and leaders are provided with training and are held accountable through performance measurements.

The NCUA takes numerous steps to keep staff informed of their right to initiate pre-complaint EEO counseling for discrimination allegations. EEO information is maintained throughout the agency in various formats. It is provided to staff through newsletters, emails, the agency's intranet, and online training. OMWI maintains an internal SharePoint site that provides employees access to all EEO guidance, agency instructions, and policies.

In addition, the NCUA's public website (www.NCUA.gov) contains No FEAR Act data. Stakeholders can also view reasonable accommodation and EEO-related instructions and the agency's Annual EEO Policy Statement (see [Appendix III](#) for full statement). During the onboarding process, new NCUA employees are provided a copy of the agency's EEO policy statement and information on their rights under applicable EEO laws. Posters that provide antidiscrimination and EEO counseling information are located throughout the NCUA's central and regional offices, including the Office of Human Resources (OHR).

Applicants for employment can access links to the No FEAR Act data, EEO Policy Statement, the No FEAR Act Notice, reasonable accommodation procedures, and the EEO complaint process guidance from the [career](#) page on the NCUA's public website. Contact information is also provided if an applicant needs additional support.

During the reporting period, the NCUA provided EEO training opportunities for managers and employees. All NCUA staff receive No FEAR Act training shortly after onboarding and biennially thereafter. NCUA examiners also receive an in-person or virtual briefing during the agency's Skills Training and Examiner Practice program. OMWI staff provide EEO and diversity training to new managers and supervisors. The agency also makes EEO training available to all new hires following the orientation process.

Program Improvements

OMWI programs provide employees with a deeper understanding of the value of diversity, equity, and inclusion in the workplace. These programs contribute to a more equitable environment and help improve the agency's EEO program by raising awareness and reducing discriminatory practices. This section describes how the following programs were improved in fiscal year 2021, and how the NCUA plans to further improve the programs in fiscal year 2022:

- Culture, Diversity, and Inclusion Council;
- Employee Resource Group program;
- Special Emphasis programs;
- OMWI Talks;
- Intern program; and
- Mentoring program.

Actions Taken to Improve Agency Complaint Program

Culture, Diversity, and Inclusion Council

The agency's Culture, Diversity, and Inclusion Council (CDI Council) includes employee representatives at all levels (for example, executives, supervisors, and non-supervisors from multiple grade levels) and a diverse spectrum of functional areas (such as the examination program, legal, human resources, and technology). In addition, members are comprised of a cross-section of the agency's staff representing different types of diversity (including race, ethnicity, gender, age, sexual orientation, disability, veteran status, and experience). A National Treasury Employees Union representative is also a member. In addition, CDI Council membership includes up to eight presidents of the agency's employee resource groups.

In late 2020, NCUA launched the culture climate survey across the agency and followed with focus groups in early 2021 to enrich the information behind the survey results. After the completion of the survey and focus groups, NCUA assembled the research findings and proceeded to brief senior management. Subsequently, the CDI Council was briefed on the survey and focus group findings and engaged the council members on two action planning sessions.

Employee Resource Group Program

The NCUA's employee resource group (ERG) network continued to evolve while adapting to challenges posed by the COVID-19 pandemic. In 2021, ERGs continued to serve as a bridge connecting group members and other NCUA employees by providing resources, coordinating special presentations, and creating a support system to help navigate the vast changes brought about by the pandemic.

As of December 2021, ERGs reported 293 employees are members of one or more groups representing 25.4 percent of NCUA employees. This continues to position the agency well above the industry-standard ERG membership goal of 10 percent of an organization's total workforce. In addition to providing essential tools and support to members, the NCUA's ERGs successfully engaged employees in more than 40 initiatives designed to provide professional development, encourage networking, and spur employee retention. The NCUA's ERGs continue to contribute in meaningful ways to foster a more inclusive work environment for all employees.

Impact Framework

To guide the overall structure, effectiveness, and impact of ERGs, the NCUA follows the 4C model™, a comprehensive assessment and alignment strategy. The 4C model focuses on four key elements vital to ERG success:

- **Career:** Help members enhance their careers via strong professional development efforts and serve as a talent engine for the organization.
- **Commerce:** Assist ERGs in developing initiatives and efforts to drive business results.
- **Culture:** Have a positive impact on members by enhancing their sense of a common bond through shared identity or interests.
- **Community:** Help members identify initiatives aimed at community outreach and collaborating with others.

These elements allow ERGs to plan and execute their activities and assess the current state, effectiveness, and impact of their work, while supporting the agency's diversity and inclusion strategic goals.

Accomplishments

ERG	Accomplishments
APIC	<ul style="list-style-type: none"> • Held <i>Generation Rising</i> movie club (April 28) • Began development of a cookbook • Collaborated on OMWI Talk Special Edition: Race, Struggle & Solidarity - Bias and Violence against Asian Americans and Pacific Islanders (April 1)
CULTURA	<ul style="list-style-type: none"> • Led “Café con Leche” presentations: <ul style="list-style-type: none"> ◦ Interview Tips and Tricks (April 21) ◦ Access Initiative (June 24) • Issued Quarterly Newsletters (3 issues as of November 2021) • Held ¡AHORA! inter-agency ERG Network “Cafecito” sessions (April 23 and May 7) • Held ¡AHORA! inter-agency panel for National Hispanic Heritage Month (Oct 20) • Facilitated “Charla” event (February 11)
MPower	<ul style="list-style-type: none"> • Held Authoring Accessible Content workshop (January 12) • Led Self-Advocacy in the Workplace discussion (April 7)
NCUA PRIDE	<ul style="list-style-type: none"> • Facilitated film club meetings: <ul style="list-style-type: none"> ◦ <i>Prom</i> (February 10) ◦ <i>Uncle Frank</i>, (May 18) ◦ <i>The Committee</i> (September 17) ◦ <i>Welcome to Chechnya</i> (November 18) • Hosted Pride in the Federal Workplace inter-agency panel (March 22) • Issued 2021 Pride Month Newsletter (June 8) • Held <i>CURED</i> documentary screening and panel in honor of LGBT History Month (October 26)
SWAN	<ul style="list-style-type: none"> • Facilitated Career Development Series: <ul style="list-style-type: none"> ◦ Coaching with Sheneé Turner, OPM-certified Federal Coach (May 12) ◦ Application & Interview Best Practices (March 17) • Held <i>Emotional Intelligence</i> workshop for members (August 4) • Collaborated with MPower on <i>Self-Advocacy in the Workplace</i> discussion (April 7)
Umoja	<ul style="list-style-type: none"> • Issued 2021 Juneteenth Newsletter for members (June 11) • Hosted presentations during membership meetings to include National Black History Month facts
VANS	<ul style="list-style-type: none"> • Coordinated presentation for officers featuring University of Central Florida film producer Lisa Mills (June 15) • Developed March 2021 newsletter and Military Moments content • Hosted <i>I am Vanessa</i> presentation with Marine Captain (Ret.) Queta Rodriguez (April 28). • Developed 2021 Veterans Day Wall of Honor and slides

NCUA's Employee Resource Groups*



APIC: Asian Pacific Islander Connection (25 members) This group's mission is to promote cultural awareness to foster a sense of community among Asian American and Pacific Islander employees and understanding and appreciation of the Asian American and Pacific Islander culture by all NCUA colleagues. The group seeks to help open more career development and professional opportunities for Asian Americans and Pacific Islanders within the NCUA's ranks and leadership positions.



CULTURA: Creating Unity, Learning to Understand, Recognizing All (67 members) CULTURA is the Hispanic and Latino employee resource group. CULTURA's goals include fostering a diverse and inclusive workforce by developing Latino leadership; bridging the connection between field and support staff; providing professional and career development opportunities; building cultural awareness; and supporting retention of Latino employees.



MPower: Employees with Disabilities (30 members) MPower's mission is to recognize and increase awareness and acceptance of employees who have a disability and those who have a family member or other loved ones who have disabilities (temporary or permanent). The group seeks to promote a supportive and accepting environment, provide assistance in achieving and celebrating the full inclusion of all employees and enhance understanding and awareness of the benefits that diversity brings to build and sustain a strong and thriving workforce.



NCUA PRIDE: People Recognizing Individual Differences Equally (46 members) NCUA PRIDE is the agency's group supporting the LGBTQ+ community. The resource group is committed to providing a safe and supportive environment for members, providing LGBTQ+-relevant informational resources, supporting members' career development, serving as an advocate to help the NCUA become more LGBTQ+-inclusive, and supporting outreach efforts both within and outside the agency.



SWAN: Supporting Women At NCUA (100 members) SWAN's purpose is to support and expand networking, educational, and outreach programs that emphasize the personal and professional development of women through expanded cultural awareness, educational events, and mentoring.



Umoja: Unity (89 members) Recognizing a common African ancestry, embraces the principle of Umoja or unity through connectivity and community by intentionally including all employees desiring to increase awareness and respect for differences, pursue opportunities for innovation and change, and align with others to build and sustain a thriving workforce.



VANS: Veterans At NCUA Serving (60 members) This ERG is for employees who have served in the military or those who support the nation's veterans. The group's mission is to leverage military experiences, share creative solutions, develop camaraderie, and enhance the mission of the NCUA among all employees, with special emphasis on the military and veteran culture.

*An employee may be a member of more than one ERG.

In addition, all ERGs continued to lend support to OMWI on the coordination of the 2021 Special Emphasis Program observances.

Program Support

Continued support from OMWI helped ERGs thrive and grow. This included:

- Consulting during new ERG formation and planning;
- Connecting individual groups and subject matter experts for special projects;
- Ongoing maintenance of ERG intranet sites to make program promotion and documentation consistent and accessible across groups;
- Assisting in logistics and funding for kickoff events and ongoing efforts;
- Assisting in developing Diversity and Inclusion Plans for each group and identifying appropriate metrics;
- Expanding ERG program visibility through coordination of posts about ERG members' experiences on the NCUA's social medial platforms (Facebook and LinkedIn).
- Promoting the program on other available platforms such as SharePoint, newsletters, meetings, and NCUA-wide events;
- Engaging in quarterly check-ins with ERGs to identify challenges and areas of opportunity; and
- Providing quarterly updates and regular meetings with executive sponsors and officers to discuss activities, requests, and additional support.

In 2021, OMWI also completed its second ERG Annual Report, which included a summary of accomplishments, challenges, and areas of opportunity. The report included an overview of the current state and helped OMWI identify the next steps to advance the program. Lastly, OMWI hosted its first ERG Awards Ceremony on December 1, 2021, to recognize the accomplishments of ERG officers and members.

Special Emphasis Program

The NCUA's Special Emphasis Program (SEP) is a significant component of the agency's effort to build inclusion and understanding. SEP activities supported the following *2018–2022 Diversity and Inclusion Strategic Plan* goals:

- **Workforce diversity:** Sustain a skilled, highly engaged, and diverse workforce at all levels, including leadership (goal 1)
- **Inclusion:** Cultivate an inclusive workplace where employees' unique talents, skills, and perspectives are valued and leveraged (goal 2)

SEP activities included eight annual observances to provide employees the opportunity to appreciate diversity through activities geared toward raising awareness, highlighting achievements, increasing knowledge, and addressing any identified barriers to the full employment and inclusion of all NCUA employees. Commemorative activities conducted for these observances were educational- and employment-related.

For each observance, OMWI hosted an event that featured a guest speaker who provided a presentation on their experiences and insights into how to be more intentionally inclusive in the workplace. Topics covered in 2021 included:

- Historic events and lessons learned;
- Diversity, equity, and inclusion efforts;
- Career development, retention and recruitment efforts; and
- Cultural educational resources.

These events were supported by the agency ERGs. ERG members developed observance-related newsletters, highlighted diverse employees on social media and the agency’s intranet, and provided educational presentations and resources in alignment with each commemoration. Details of each event appear in the following table.

Observance and Month	Event Title	Speaker
National Black History Month , February (est. by Public Law 99-244)	<i>Half American: The Epic Story of Black Americans Fighting World War II at Home and Abroad</i>	Matthew Delmont , historian and Dartmouth College professor
National Women’s History Month , March (est. by Public Law 100-9)	<i>Women’s Suffrage Movement: How Women Won the Vote</i>	Johanna Neuman , award-winning author, historian, and former journalist
Asian American and Pacific Islander Heritage Month , May (est. by Title 36, U.S. Code, Section 102)	<i>The Girl in the Picture</i>	Phan Thi Kim Phuc , known as the Vietnam War’s “Napalm Girl”
Pride Month , June	<i>Coming Out & Working Through: An Honest Conversation about Sexual Identity, Gender, and Families</i>	Kristin Russo , writer, speaker, and educator on LGBTQ+ issues
National Hispanic Heritage Month , September (est. by Title 36, U.S. Code, Section 126)	<i>Afro-Latinos: Glory and Greatness, Radiance and Resilience</i>	Kim Haas , executive producer and host of the PBS travel show, Afro-Latino Travels with Kim Haas
National Disability Employment Awareness Month , October (est. by Title 36, U.S. Code, Section 121)	<i>I’m More Than My Dwarfism</i>	Becky Curran Kekula , motivational speaker and inclusion advocate

Observance and Month	Event Title	Speaker
Veterans Day Observance, November (est. by Public Law 380-250)	<i>The Fewer, The Prouder: Minorities and Women in the Military</i>	Queta Rodríguez , retired U.S. Marine Corps captain and regional director, FourBlock
National American Indian/ Alaska Native Heritage Month, November (est. by Public Law 103-462)	<i>Honoring the Legacy of Native Americans in the U.S. Armed Force: The National Native American Veterans Memorial</i>	Rebecca Trautmann , National Native American Veterans Memorial, and Betsy Gordon , National Museum of the American Indian

OMWI Talks

Since 2017, the NCUA has hosted a series of informal, facilitated, and open discussions about sensitive, diversity-related topics. These conversations, OMWI Talks, give employees a safe space to discuss differences, broaden awareness and understanding of others, and learn how to manage the challenges diversity can create in the workplace.

In 2021, OMWI continued the series with monthly conversations to address financial disparity, gender disparity, racism, and other relevant topics. Each event attracted more than 200 participants and was facilitated by a member of the NCUA's senior leadership team including the Board Chairman, the chief of staff, and the executive director. The NCUA will continue to host OMWI Talks in 2022.

Intern Program

The NCUA sponsored students in three distinct intern programs during 2021.²

Contract Interns

The NCUA has six individual, multi-year contracts with organizations serving underrepresented students. Through these contracts, the agency provides summer internship access and opportunities to college and university students in undergraduate, graduate, doctorate, and juris doctorate programs. Internships under this program have varying lengths, from 8, 10, 12 or 15 weeks. Under these contracts, the contracted organizations receive weekly compensation per student from the NCUA. The organizations, in turn, are responsible for all pay and benefits the interns receive during their participation in the program. This program provides students an enriching learning opportunity. Participants gain experience in a federal government setting and the opportunity to perform meaningful projects, while bringing diverse perspectives, talent, skills and experience to the agency.

In 2021, OMWI hosted five summer interns from three of the contracted organizations:

- Hispanic Association of Colleges and Universities;
- Minority Access; and
- Thurgood Marshall College Fund

² The 2021 intern programs were conducted remotely, and interns were provided the necessary resources to complete work assignments and benefit from an intern experience.

OPM Pathways Program

OHR used the Office of Personnel Management's [Pathways Program](#) to attract seven students from a variety of backgrounds to serve as interns during the summer. This program provides work assignments and developmental experiences intended to promote careers for individuals who have recently graduated from a qualifying educational institution or program. Participants develop skills through challenging work assignments and by using Individual Development Plans, mentors, and formal interactive training.

Mayor Marion S. Barry Summer Youth Employment Program

With oversight from OHR, the NCUA partnered with the Office of the Comptroller of the Currency (OCC) to host five summer high school interns through the [Mayor Marion S. Barry Summer Youth Employment Program](#).³ The program provided students from economically disadvantaged backgrounds enrolled in targeted Washington, D.C., public and charter schools with an opportunity to work, explore career paths, and gain an understanding of the missions and important work federal regulatory agencies do for the financial services industry.

Mentor Program

In 2021, the NCUA enhanced its formal mentor program, which was established in 2016. The enhanced program offers improvements over the previous program, including:

- Addition of a web-based portal, application, and matching process;
- Availability of support staff for OMWI program manager and program participants; and
- Extensive online library of resources to help mentors and mentees address frequent questions or challenging situations.

The 2021 program included 26 mentoring pairs. Mentorship programs are a proven diversity and inclusion best practice. Some of the benefits participants gain in the formal mentorship program are:

- Accelerated learning about NCUA's culture and operations;
- Stronger professional relationships that support career development;
- A broader organizational perspective; and
- More fully developed talent and potential.

Actions Planned to Improve Agency Complaint Program

In addition to the continuation of ongoing programs and education, the NCUA will enhance existing programs and activities, and launch new initiatives, in 2022 as described in this section.

³ OCC coordinates intern participation for multiple federal agencies, including NCUA. Under OCC, the program is branded as the High School Scholars Intern Program, or HSSIP.

CDI Council

In 2022, the CDI Council will create an action plan to address the results obtained from the culture climate assessment survey and focus groups conducted in late 2020. The CDI Council plans to focus its initial two meetings during the second quarter of 2022 on developing the implementation plan for the recommendations proposed. The Council will then launch implementation of the recommendations during the third and fourth quarter of 2022.

Employee Resource Groups

In addition to the ongoing programs and education, ERG initiatives planned for 2022 include:

Request Process

OMWI continues to develop processes to guide more efficient and effective interactions between ERGs and OMWI. These include requests, approvals, and alignment of mutual expectations. Some improvements include revising the ERG Handbook and ERG Instruction 1270.8 based on member feedback and conversations with ERG officers and executive sponsors. Updates to the handbook include establishing new processes, activity timeframes, and programs.

Annual Training

OMWI will host a voluntary ERG leadership training to ensure newly elected officers have the resources and knowledge necessary to carry out their duties.

ERG Ambassador Program

The NCUA rescheduled the launch of the ERG Ambassador Program for 2022. This program will identify ERG member volunteers willing to support agency-wide recruitment efforts, aid in developing the Contract Interns Program, and support career advancement programs.

Accessibility of Resources

OMWI will identify in-house training available to ERG officers, adding to the resources available that allow them to continue to develop their skills.

External Outreach

OMWI will continue to use new communication methods to reach out to prospective applicants identified during recruitment outreach events. OMWI is building a list of potential employment candidates. The agency will allow candidates to provide their name and email address to receive NCUA vacancy announcements. New vacancy announcements released to the public will be sent to members of the email list. OHR and OMWI will also continue their collaborative recruitment and outreach efforts.

The NCUA will also continue using social media to enhance recruitment efforts. OMWI will tie recruitment efforts into the SEP and work with the agency's ERGs to ensure broad distribution of social media content, in partnership with the Office of External Affairs and Communications.

In 2022, OMWI will focus on coordinating the plans for a targeted barrier analysis to identify challenges in the hiring and retention of women and Hispanic Latino employees within the agency. In addition, the NCUA will continue to work with a vendor to expand the diverse, qualified candidate pool, targeting candidates with disabilities, under-represented groups, women, and veterans.

Internal Outreach

Training

NCUA will incorporate two diversity and inclusion training modules into the learning plans for all employees. The first module, *Workplace Diversity, Equity, and Inclusion in Action* is a guide to defining diversity, equity, and inclusion and advancing meaningful and impactful diversity, equity, and inclusion practices in the workplace. Employees will learn to recognize key characteristics of DEI and practices for building and sustaining a diverse and inclusive culture, how to identify behaviors that signal a breakdown in achieving inclusion, key elements that enable diversity, equity, inclusion, and belonging to take root, and the steps for demonstrating agility and resilience.

In the second module, *Recognizing and Addressing Micro-behaviors in the Workplace*, employees will learn to recognize the characteristics of micro-behaviors and how to decode the messages they send. It also includes ways to identify when and how to take action to address micro-aggressions, and how to use micro-inclusions as an antidote to micro-aggressions.

OMWI will also partner with the Leadership Training program to identify new modules for leadership training and a curriculum to incorporate into leadership development. OMWI has requested additional questions be integrated into the FEVS relative to inclusion and engagement, to help measure the success of programming to enhance the inclusive culture of the agency.

In addition, OMWI and OHR plan to collaborate to deliver disability hiring, retention and career development training to all hiring managers and OHR points of contact.

During 2022, NCUA managers will experience interactive and team-building training on diversity, equity, and inclusion to enhance both awareness and competence in these principles.

Disability Solutions Desk

OMWI will launch a Disability Solutions Desk pilot in 2022, which involves establishing a central point of access through an organizational mailbox. Employees will be able to send questions, express concerns and challenges, and offer recommendations related to disabilities. Dedicated OMWI staff will review all incoming messages and coordinate a response and support with appropriate program offices.

OMWI plans to collect and analyze statistical and anecdotal data and use the resulting findings to develop training and programming to support agency employees with disabilities. OMWI further plans to publish responses to frequently asked questions during the pilot months and report out its findings and recommendations to agency leadership and the employee union to be used in determining next steps.

Special Emphasis Program

OMWI's SEP series will support broader efforts to address potential barriers to the career advancement and retention of women and Hispanics in the NCUA workplace. The program will identify speakers to present on topics such as best practices for career retention, career development resources, attracting new talent strategies, and cultural intelligence.

The SEP will also host a presentation featuring a panel of Native American leaders in the financial regulatory sector to increase the visibility of the underrepresented population and recognize their contributions. Such programs will increase recognition of employees to further enhance acknowledgement of the contributions various groups make toward achieving NCUA's mission.

OMWI Talks

OMWI will continue to leverage the OMWI Talks platform to encourage employees to feel comfortable discussing topics related to diversity and inclusion within the workplace. In 2022, OMWI plans to update the format of OMWI Talks to better meet employee needs and invite contributions. Events in 2022 will feature an informal interview of an NCUA leader, on a topic of their choice. Topics will be related to diversity, equity, and inclusion.

A member of the OMWI team will conduct each interview and facilitate a Q&A session with the audience after the interview. The goals of these recurring events will remain the same:

- Expose employees to diverse perspectives;
- Increase cultural competency of leaders and employees who attend or lead conversations; and
- Tackle difficult conversations around diversity, equity, and inclusion.

The most successful OMWI Talks have been those in which agency leaders share their perspectives and engage the audience through personal stories. The new format stands to help achieve these goals while also giving employees the opportunity to learn more about agency leaders.

VIBE

OMWI's VIBE campaign (**V**alue Differences, **I**ntentionally Include, **B**reak Biases, **E**mbrace Change) will continue to play a role in promoting a diverse culture of inclusion among the NCUA workforce. In 2022, OMWI plans to continue the VIBE speaker series featuring presentations on topics that align with training on diversity, equity, inclusion and belonging.

APPENDIX I: No FEAR Act Data for Fiscal Year 2021

Q1: October 1 – December 31, 2020

Q3: April 1 – June 30, 2021

Q2: January 1 – March 31, 2021

Q4: July 1 – September 30, 2021

Table data for fiscal year 2021 quarters reflect count as of quarter-end; they are not cumulative.

	2016	2017	2018	2019	2020	2021 Q1	2021 Q2	2021 Q3	2021 Q4
Complaints Filed	3	6	5	5	5	1	1	1	1
Complainants	3	6	5	4	5	1	1	1	1
Repeat Filers	0	0	0	1	0	0	0	0	0

Basis ⁴	2016	2017	2018	2019	2020	2021 Q1	2021 Q2	2021 Q3	2021 Q4
Race	2	4	3	4	1	1	1	1	1
Color	1	1	3	2	0	0	0	0	0
Religion	0	0	0	0	0	0	0	0	0
Reprisal	1	2	2	3	3	0	0	0	0
Sex	1	3	1	3	3	1	1	1	1
National Origin	1	0	1	0	0	0	0	0	0
Equal Pay Act	0	1	0	0	0	0	0	0	0
Age	0	3	2	3	2	1	1	1	1
Disability	0	3	1	4	3	0	0	0	0
Non-EEO	0	0	0	0	1	0	0	0	0

⁴ Complaints may be filed alleging multiple bases. Sum of bases may not equal total complaints filed.

Issue	2016	2017	2018	2019	2020	2021 Q1	2021 Q2	2021 Q3	2021 Q4
Appointment/ Hire	0	0	0	0	0	0	0	0	0
Assignment of Duties	2	1	1	0	2	0	0	0	0
Awards	1	0	1	1	0	0	0	0	0
Conversion to Full-Time	0	0	0	0	0	0	0	0	0
Demotion	0	0	0	1	0	0	0	0	0
Reprimand	0	0	0	1	0	0	0	0	0
Removal	0	0	0	0	0	0	0	0	0
Suspension	0	0	0	1	1	0	0	0	0
Other	0	0	0	0	1	0	0	0	0
Duty Hours	0	0	0	0	0	0	0	0	0
Evaluation Appraisal	2	0	2	1	2	0	0	0	0
Examination/ Test	0	0	0	0	0	0	0	0	0

Harassment	2016	2017	2018	2019	2020	2021 Q1	2021 Q2	2021 Q3	2021 Q4
Non-Sexual	0	0	0	2	2	0	0	0	0
Sexual	1	0	0	0	1	0	0	0	0
Medical Exam	0	0	0	0	0	0	0	0	0
Pay (including Overtime)	1	1	0	0	0	0	0	0	0
Promotion / Non-Selection	1	4	1	2	2	1	1	1	1

Reassignment⁵	2016	2017	2018	2019	2020	2021 Q1	2021 Q2	2021 Q3	2021 Q4
Denied	0	0	0	0	0	0	0	0	0
Directed	0	0	0	0	0	0	0	0	0
Reasonable Accommodation	0	2	1	1	0	0	0	0	0
Reinstatement	0	0	0	0	0	0	0	0	0
Retirement	0	0	1	0	0	0	0	0	0
Termination	0	1	0	0	0	0	0	0	0
Terms / Conditions of Employment	1	0	1	1	3	0	0	0	0
Time and Attendance	0	0	0	1	1	0	0	0	0
Training	0	0	0	1	0	0	0	0	0
Other (verbal remarks)	0	0	1	1	0	0	0	0	0

⁵ Complaints can be filed alleging multiple issues. The sum of issues may not equal total complaints filed.

Processing Time (calendar days)	2016	2017	2018	2019	2020	2021 Q1	2021 Q2	2021 Q3	2021 Q4
Complaints pending during fiscal year	10	8	13	12	12	8	6	5	5
Average days: investigation state	201	198	229	157	204	196	219	229	229
Average days: final action stage	0	0	90	0	69	0	0	0	0
Complaint pending during fiscal year where hearing was requested	6	4	8	9	9	5	5	5	5
Avg. days: investigation stage	206	245	261	238	228	230	231	229	229
Average days; final action stage	335	293	333	213	424	433	421	400	479
Complaint pending during fiscal year where hearing was not requested	1	1	2	0	1	0	0	0	1
Avg. days: investigation stage	178	166	179	0	180	0	0	0	202
Avg. days: final action stage	155	58	54	0	57	0	0	0	60

Dismissed by Agency	2016	2017	2018	2019	2020	2021 Q1	2021 Q2	2021 Q3	2021 Q4
Total complaints	0	0	1	0	1	0	0	0	0
Avg days pending before dismissal	0	0	90	0	69	0	0	0	0

Withdrawn by Complainant	2016	2017	2018	2019	2020	2021 Q1	2021 Q2	2021 Q3	2021 Q4
Total withdrawals	0	0	0	0	0	0	1	1	1

Total Final Actions Finding Discrimination	2016		2017		2018		2019		2020		FY 21 Q1		FY 21 Q2		FY21 Q3		FY 21 Q4			
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%		
Without Hearing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
With Hearing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Total	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A

Findings of Discrimination Rendered by Basis ⁶	2016		2017		2018		2019		2020		FY 21 Q1		FY 21 Q2		FY21 Q3		FY 21 Q4			
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%		
Race	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Color	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Religion	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Reprisal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sex	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
National Origin	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Equal Pay Act	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Age	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Disability	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-EEO	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A

⁶ Complaints may be filed alleging multiple bases. The sum of bases may not equal total complaints and findings.

Findings After Hearing ⁷	2016		2017		2018		2019		2020		FY 21 Q1		FY 21 Q2		FY21 Q3		FY 21 Q4			
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%		
Race	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Color	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Religion	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Reprisal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Sex	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
National Origin	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Equal Pay Act	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Age	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Disability	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Non-EEO	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Total	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A

Findings Without Hearing ⁸	2016		2017		2018		2019		2020		FY 21 Q1		FY 21 Q2		FY21 Q3		FY 21 Q4			
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%		
Race	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Color	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Religion	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Reprisal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Sex	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
National Origin	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Equal Pay Act	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Age	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Disability	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Non-EEO	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Total	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A

⁷ Complaints may be filed alleging multiple bases. The sum of bases may not equal total complaints and findings.

⁸ Complaints may be filed alleging multiple bases. The sum of bases may not equal total complaints and findings.

Findings of Discrimination Rendered, by Issue	2016		2017		2018		2019		2020		FY 21 Q1		FY 21 Q2		FY21 Q3		FY 21 Q4	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Appointment/Hire	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Assignment of Duties	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Awards	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Conversion to Full-time	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Disciplinary Action	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Demotion	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Reprimand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Suspension	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Removal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Duty Hours	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Evaluation Appraisal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Examination/Test	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Harassment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Sexual	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sexual	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Medical Examination	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Pay (Including Overtime)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promotion/Non-Selection	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Reassignment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Denied	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Directed	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Reasonable Accommodation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Reinstatement	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Retirement	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Termination	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Terms/Conditions of Employment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Time and Attendance	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Training	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A

Findings After Hearing	2016		2017		2018		2019		2020		FY 21 Q1		FY 21 Q2		FY21 Q3		FY 21 Q4	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Appointment/Hire	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Assignment of Duties	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Awards	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Conversion to Full-time	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Disciplinary Action	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Demotion	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Reprimand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Suspension	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Removal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Duty Hours	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Evaluation Appraisal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Examination/Test	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Harassment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Sexual	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sexual	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Medical Examination	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Pay (including overtime)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promotion/Non-Selection	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Reassignment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Denied	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Directed	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Reasonable Accommodation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Reinstatement	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Retirement	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Termination	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Terms/Conditions of Employment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Time and Attendance	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Training	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A

Findings Without Hearing	2016		2017		2018		2019		2020		FY 21 Q1		FY 21 Q2		FY21 Q3		FY 21 Q4	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Appointment/Hire	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Assignment of Duties	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Awards	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Conversion to Full-time	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Disciplinary Action	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Demotion	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Reprimand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Suspension	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Removal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Duty Hours	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Evaluation Appraisal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Examination/Test	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Harassment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Sexual	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sexual	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Medical Examination	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Pay (Including Overtime)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promotion/Non-Selection	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Reassignment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Denied	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Directed	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Reasonable Accommodation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Reinstatement	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Retirement	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Termination	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Terms/Conditions of Employment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Time and Attendance	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Training	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A	0	N/A

Pending Complaints Filed in Previous FY, by Status	2016	2017	2018	2019	2020	2021 Q1	2021 Q2	2021 Q3	2021 Q4
Total complaints	5	7	7	5	4	6	5	4	3
Total complainants	5	7	7	5	4	6	5	4	3

Pending Complaints Filed in Previous FY Pending at Close of Quarter	2016	2017	2018	2019	2020	2021 Q1	2021 Q2	2021 Q3	2021 Q4
Investigation	0	0	0	0	0	0	0	0	0
Hearing	2	3	3	5	4	4	5	4	3
Final Action	0	0	0	0	0	0	0	0	0
Appeal with EEOC Office of Federal Operations	3	4	4	0	0	0	0	0	0

Complaint Investigations	2016	2017	2018	2019	2020	2021 Q1	2021 Q2	2021 Q3	2021 Q4
Pending Complaints Filed in Previous FY, where investigation exceeds required timeframe	0	0	1	1	0	0	0	0	0

APPENDIX II: Annual EEO Policy Statement

Office of the Chairman

Annual Equal Employment Opportunity Policy Statement

September 2021

Equal Employment Opportunity (EEO) is the foundation of a workplace where all employees are treated fairly, with dignity, and respect. The National Credit Union Administration prohibits discrimination on the basis of race, color, religion, sex (including gender identity, pregnancy, transgender status, and sexual orientation), national origin, age (40 or older), disability (physical and mental) or genetic information (including family medical history). Retaliation for prior involvement in protected EEO activity is also prohibited. The NCUA also prohibits discrimination based on political affiliation, parental and marital status, military service or any other non-merit-based factor.

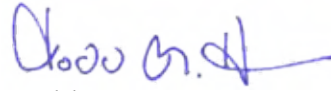
These protections apply to all employees and applicants for employment, and extend to all management practices and decisions, including recruitment, hiring practices, appraisals, promotions, training and career development programs. Consistent with these obligations, NCUA also provides reasonable accommodations to employees and applicants with disabilities and for sincerely held religious beliefs, observances, and practices.

The NCUA prohibits and has zero tolerance for harassment, both sexual and non-sexual. Managers and supervisors are responsible and held accountable for monitoring the work environment and ensuring it is free of unlawful employment practices. Managers and supervisors are required to take swift action to investigate when unlawful practices are reported, and to take immediate and appropriate corrective action when they occur. Similarly, all NCUA employees have a duty not to engage in harassing conduct and to report any such conduct if it occurs.

NCUA employees and applicants are also protected against retaliation. Consistent with federal laws, acts of retaliation against an employee who engages in protected activity such as reporting discrimination or harassment, participating in the EEO process, whistleblowing, or the exercise of any appeal or grievance right provided by law will *not* be tolerated at NCUA.

All NCUA employees are responsible for supporting and complying with the agency's EEO policies and instructions in their daily conduct and activities, and for abiding by equal opportunity laws and policies. NCUA employees or applicants who believe that they have been subjected to discrimination, unlawful harassment, or retaliation should contact NCUA's EEO Counseling Hotline at (703) 518-6325, or eeomail@ncua.gov; or, as appropriate, the Office of Special Counsel at (202) 804-7000 or the Merit Systems Protection Board at (202) 653-7200. In addition to these processes, reports of harassment may also be submitted to the NCUA Anti-Harassment Coordinator in the Office of Ethics Counsel at antiharassment@ncua.gov, or by calling (703) 518-6613. Employees who experience or observe harassment should report it to any manager or supervisor, or to the Anti-Harassment Coordinator in the Office of Ethics Counsel.

As NCUA Chairman, and on behalf of the NCUA Board, I affirm the agency's commitment to a workplace free of unlawful discrimination, harassment, and retaliation. The NCUA is a workplace where employees are treated fairly with respect and dignity, and where equal employment opportunity is at the core of who we are and how we achieve our mission.



Todd M. Harper
Chairman

APPENDIX III: Prevention of Harassment in the Workplace Instruction

NCUA



INSTRUCTION

NO. 1235.08 (REV. 2)	DATE: December 16, 2021
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SUBJ: Prevention of Harassment in the Workplace

TO: All NCUA Staff

ENCL: [NCUA Anti-Harassment Process](#)

1. **PURPOSE.** This Instruction establishes NCUA's policy on preventing harassment (including sexual harassment) in the workplace, and the procedure for employees and contractors to report harassment.
2. **CANCELLATION.** NCUA Instruction No. 1235.08 (Rev. 1) dated June 26, 2015, is cancelled and should be removed from the files.
3. **BACKGROUND.** The U.S. Equal Employment Opportunity Commission (EEOC) enforces the prohibitions against employment discrimination in: a) Title VII of the Civil Rights Act of 1964; b) the Age Discrimination in Employment Act of 1967; c) Title I and Title V of the Americans with Disabilities Act of 1990; d) Sections 501 and 505 of the Rehabilitation Act of 1973; e) Title II of the Genetic Information Nondiscrimination Act of 2008; and f) The Civil Rights Act of 1991. These laws prohibit discrimination based on race, color, sex (including sexual orientation, gender identity, and pregnancy), religion, national origin, age (40 or older), disability, genetic information, or retaliation for protected activity. Other authority, including Executive Order 13152 and the Civil Service Reform Act, preclude discrimination based on parental status and political affiliation. Harassment because of an individual's membership in any of these protected bases is a form of unlawful discrimination. NCUA is committed to equal employment opportunity and a workplace free of unlawful discriminatory harassment or any other category of harassment.
4. **DEFINITIONS.**
 - A. **Employee.** All persons employed by the NCUA. For the purposes of the federal equal employment opportunity (EEO) complaint process, contractors are not generally considered NCUA employees, but they may use the NCUA antiharassment reporting process described in this Instruction.
 - B. **Harassment.** Behavior that is unwelcome or offensive to a reasonable person and that creates conditions that interfere with work performance or creates an intimidating, hostile, or offensive environment.

Examples of Prohibited Harassing Behavior. Examples of harassing behaviors prohibited by NCUA include, but are not limited to:

- i. Epithets, slurs, or threatening, intimidating or hostile comments or acts that relate to race, color, sex (including sexual orientation, gender identity, and pregnancy), religion, national origin, age (40 or older), disability, genetic information, or retaliation for protected activity;
- ii. Written or graphic material in the workplace (or electronic circulation of that material on NCUA computer or communications systems) that denigrates or shows hostility or aversion toward an individual or group because of race, color, sex (including sexual orientation, gender identity, and pregnancy), religion, national origin, age (40 or older), disability, genetic information, or retaliation for protected activity;
- iii. Sexual harassment, including unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature. Examples of sexual harassment may include, but are not limited to: any implicit or explicit sexual conduct to influence or affect the career, pay, or job of another employee; sexually oriented comments about an individual's body or sexual prowess; sexually offensive comments, gestures, jokes, advances, physical contact, or propositions; or any display of sexually suggestive objects or pictures in the workplace.

C. **Protected Activity.** Protected activities are activities that workers may engage in, such as reporting harassment, without fear of retaliation by supervisors or employers. Protected activity includes opposition to a practice believed to be unlawful discrimination or harassment. Protected activity also includes participation in the anti-harassment process, such as filing a report of harassment or providing evidence in response to a management inquiry regarding alleged harassment.

D. **Protected Basis.** A protected basis is any of the statutorily protected characteristics which, by statute, are among those specifically designated by the statutes enforced by the EEOC, listed in the Background Section of this Instruction, above, including race, color, sex (including sexual orientation, gender identity, and pregnancy), religion, national origin, age (40 or older), disability, genetic information, or retaliation for protected activity.

5. **POLICY.** The NCUA is committed to maintaining a work environment free of harassment and correcting such conduct before it becomes severe or pervasive. The NCUA does not tolerate unlawful harassment of, or by, employees, contractors, or third parties. The NCUA does not tolerate retaliation for opposing harassment or participation in this anti-harassment process or for opposing discrimination or participation in the EEO complaint process.

A. **Scope.** This policy covers all forms of harassment, including sexual harassment, and applies to NCUA employees and contractors whether or not they are in NCUA facilities while performing their official duties. It also applies to the conduct of third parties who visit NCUA facilities and to third parties at facilities visited by NCUA employees on official NCUA business. Third parties include vendors, non-NCUA contractors, credit union officials or staff, and members of the general public.

NCUA's anti-harassment policy includes sexual harassment that may include employees' conduct outside of NCUA workspace and/or working hours, including work-related travel, because conduct between NCUA employees occurring outside of the agency's workspace or working hours may adversely impact the agency's work environment. Such conduct will be assessed for compliance with this policy on a case-by-case basis.

- B. **Protection from Retaliation.** It is unlawful for an individual to be retaliated against for filing harassment allegations, participating in the investigatory process, and any other protected activity. The NCUA will not tolerate any retaliation against an employee because they engaged in a protected activity or made allegations of harassment, witnessed harassing conduct, or provided information concerning harassment claims. The NCUA will take prompt corrective action in any situation involving retaliation. Employees should report retaliation to a supervisor or manager, a human resources specialist or advisor, an EEO specialist in the Office of Minority and Women Inclusion (OMWI), or the Anti-Harassment Coordinator in the Office of Ethics Counsel (OEC).

6. **RESPONSIBILITIES.**

- A. **Employees.** Employees must not engage in harassment. Employees are responsible for ensuring that their language and conduct is considerate of the rights and privileges of others in the conduct of their official duties. All NCUA employees and contractors are responsible for adhering to NCUA's anti-harassment policy and for cooperating fully in its enforcement, including the investigation of alleged incidents of harassment.

Employees are responsible for reporting any incident of harassment that they experience or observe, preferably before it becomes a pattern of misconduct that is pervasive and offensive, constituting a hostile work environment. Early identification and eradication of all types of harassment which detract from an efficient workplace is the responsibility of all NCUA employees.

Employees have the right to reasonably oppose harassment, and any allegedly discriminatory employment practice or decision, and to participate in NCUA's anti-harassment process, including participation as a witness when reports are filed by others, without fear of retaliation.

Individuals may choose to remain anonymous when reporting an incident of harassment or participating as a witness in this process. Anonymity may, however, limit the ability of the NCUA to conduct an effective inquiry. In addition, as an employer NCUA may be required to disclose certain information to individuals who have an official need to know due to the nature of the allegations, or to third parties as required by law or regulation.

- B. **Supervisors and Managers.** As employees, supervisors and managers must not engage in harassment. They are responsible for ensuring that the NCUA workplace is free of harassment and meets the requirements of this anti-harassment policy, including all federal anti-discrimination policies and directives. Supervisors must monitor the work environment to ensure compliance with this policy.

All supervisors and managers are responsible for acting promptly and appropriately to prevent harassment in the workplace when they observe harassing conduct or are otherwise made aware of such conduct. They are responsible for acting appropriately to prevent retaliation against those who report harassment.

When an employee reports alleged harassment to a supervisor or manager, management is obligated to ensure that the allegation is promptly addressed and investigated, regardless of whether the report conforms to a particular format or is made in writing.

Supervisors or managers must promptly (within three business days) notify the Anti-Harassment Coordinator in the OEC (see Procedures for Resolving Reports of Harassment, below) about any incident of harassment that they witness or that is otherwise brought to their attention. When further investigation is necessary, management may be required to take interim measures, such as modifying work assignments or work locations, to ensure that alleged harassment ceases promptly and does not recur. If it is determined that harassment has occurred, supervisors and managers have a duty to take corrective or disciplinary action, in consultation with the appropriate officials, which include the Anti-Harassment Coordinator, and may also include the Office of Minority and Women Inclusion (OMWI) when EEO issues are raised, the Office of Human Resources (OHR) when disciplinary actions, employee counseling, or other HR actions are required, and the Office of General Counsel when legal issues arise.

- C. **Office of the Inspector General**. All harassment allegations against an NCUA employee brought by a person who is not an NCUA employee (e.g., credit union employee, credit union vendor), will be referred to the Office of the Inspector General for a decision on whether to open an investigation. Rather than opening an investigation, the OIG may refer harassment allegations to the Anti-Harassment Coordinator to address. In circumstances involving harassment of or by an NCUA contractor under OIG's contracting authority, OIG will review relevant contracts in consultation with the OEC for potential remedies to identify immediate and appropriate corrective action.
- D. **Office of General Counsel (OGC)**. The Office of General Counsel will provide legal advice, as needed. In circumstances involving harassment of or by an NCUA contractor under OGC's contracting authority, OGC will review relevant contracts in consultation with the Office of the Chief Ethics Counsel or Anti-Harassment Coordinator for potential remedies to identify immediate and appropriate corrective action.
- E. **Office of Human Resources (OHR)**. The Office of Human Resources will provide advice on human resources (personnel) matters.
- F. **Office of Ethics Counsel (OEC)**. The Office of Ethics Counsel will publicize anti-harassment policy and procedures throughout the agency, to ensure that NCUA employees are aware of their rights and responsibilities, including the appropriate procedures to follow and to report harassment or retaliation pursuant to this Instruction. All harassment allegations brought by an NCUA employee or NCUA contractor will be referred to the Anti-Harassment Program in OEC, as set forth in Section 7

(Procedures for Resolving Reports of Harassment) below. The Anti-Harassment Coordinator in the OEC will:

- Conduct intake and monitor all such allegations;
- Conduct an initial examination of each report of harassment to determine an immediate and appropriate response, in consultation with the Human Resources Office, the Office of General Counsel, EEO officials in OMWI, and appropriate agency managers and supervisors, as needed;
- Conduct a management inquiry into allegations of harassment when necessary to determine whether harassment has occurred and recommend appropriate corrective action;
- Receive and review all Anti-Harassment Program management inquiry investigative reports produced, whether by NCUA personnel or contract investigators, and in consultation with OHR, OGC, and EEO officials in OMWI, as needed, determine whether harassment has occurred and whether to recommend corrective action;
- To the greatest extent possible, ensure the confidentiality of matters referred to the Anti-Harassment Program, consistent with law and regulation;
- Maintain and track information on the number of allegations referred to the Anti-Harassment Program, the bases for the allegations, and corrective actions taken; and
- Develop and deliver training and technical assistance on NCUA's Anti-Harassment policies and procedures, including training for all employees, supervisors and managers on their rights and responsibilities in this process. Provide periodic training for managers and supervisors. Incorporate these policies and procedures into employee orientation materials and consult with the regional offices on their education and awareness efforts regarding anti-harassment.

The Chief Ethics Counsel or the Anti-Harassment Coordinator will also refer all reports involving non-employees to the Office of the Inspector General for consideration.

- G. **Office of Minority and Women Inclusion (OMWI)**. OMWI will provide advice on EEO matters and inform OEC of all EEO counseling activity where harassment is alleged.
- H. **Office of Chief Financial Officer (OCFO) and Asset Management and Assistance Center (AMAC)**. In circumstances involving harassment of or by an NCUA contractor, OCFO or AMAC, as appropriate, will review relevant contracts in consultation with the Office of General Counsel and the Chief Ethics Counsel or Anti-Harassment Coordinator for potential remedies to identify immediate and appropriate corrective action.

7. **PROCEDURES FOR RESOLVING REPORTS OF HARASSMENT**.

An employee who believes they have experienced harassment should first inform the offending person that such conduct is unwelcome and must stop. If the employee is not comfortable doing so, the employee should promptly report the matter to their supervisor, any other management official, or the Anti-Harassment Coordinator in OEC. Reports of harassment may be initiated by contacting any supervisor or manager, by calling the Anti-Harassment Hotline at (703) 518-6613, or by emailing the Anti-Harassment Program in-box: Anti-Harassment@ncua.gov. These procedures do not replace, substitute,

or satisfy the separate requirements of filing an EEO complaint, negotiated or administrative grievance, Merit Systems Protection Board appeal or other statutory grievance procedure. Information regarding the filing of an EEO complaint is provided in Section B, below. An employee may use the Internal NCUA Anti-Harassment Report Process (at the above email address) or the EEO Complaint Process (item B below), or both processes simultaneously, to address harassment claims. The bases for EEO complaints include race, color, sex (including sexual orientation, gender identity, and pregnancy), religion, national origin, age (40 or older), disability, genetic information, or retaliation for protected activity. No protected basis is required to use the Internal NCUA Anti-Harassment Report Process. Employees who choose to use both processes should be mindful of the 45-day time period required to initiate an EEO complaint, and that referring a report to the Anti-Harassment Program will not satisfy the 45-day time period required to initiate the EEO process.

- A. **Internal NCUA Process for Harassment Reports.** An NCUA employee who experiences harassment should notify their supervisor, any management official, the EEO office, or the Anti-Harassment Coordinator in OEC before the conduct becomes severe or pervasive. Any management official notified of a report of harassment (orally or in writing) must notify the Anti-Harassment Coordinator in OEC within three (3) business days of receiving the report of harassment. Within ten (10) calendar days of receipt of notification of a report of harassment, OEC will conduct an initial inquiry and, when appropriate, attempt to informally resolve the matter. Such resolution may include proposed disciplinary action for those employees engaged in the reported harassing conduct, remedies for those affected by the reported conduct, and recommendations to ensure such conduct does not recur. If needed, the Anti-Harassment Coordinator will assign an independent factfinder who will conduct a prompt, thorough, and impartial inquiry into the reported harassment. After completion of the fact-finding inquiry, the independent factfinder will summarize the facts found and provide a report to OEC.
- i. **Corrective Action.** Harassment may take different forms and, therefore, may require different corrective actions. Corrective action must be taken to prevent or eliminate the conduct before it rises to the level of unlawful harassment, and to ensure that it does not recur. The NCUA will initiate immediate and appropriate corrective action within 60 calendar days of receiving a report of harassment. The circumstances of each case will dictate the corrective action required. In cases where final corrective action cannot be completed within 60 calendar days, interim corrective actions may be put in place to immediately address the reported conduct.

If it is determined that harassment or other inappropriate conduct has occurred, the Anti-Harassment Coordinator and/or the Chief Ethics Counsel, in coordination with the supervisor of the offending NCUA employee, will consult with NCUA's OHR and OGC, if necessary, to determine immediate and appropriate corrective action, including any warranted disciplinary action. The Chief Ethics Counsel may then recommend corrective action to the appropriate supervisory chain of command, including the NCUA Board, the Office of the Executive Director, Regional or Office Directors, or others with delegated authority to implement such actions. In all cases, neither the Anti-Harassment Coordinator nor the Chief Ethics Counsel act as proposing or deciding officials if NCUA management determines that corrective action must be taken.

The supervisor of the offending employee will ensure that OEC is informed of decisions to take corrective action or not in connection with the harassing behavior.

For reports involving an NCUA contractor, the OEC will also report the conduct to the OCFO's Division of Procurement and Facility Management, the AMAC, or other office with contracting authority, as appropriate, which will review the related contract in coordination with OGC for appropriate corrective action. If the offending party is not an NCUA employee or contractor, the agency will take action reasonably calculated to ensure that the conduct does not recur. In either circumstance, the office with the relevant contracting authority will inform the Anti-Harassment Coordinator in OEC of the corrective action taken, including a decision not to act.

- ii. **Confidentiality.** The information collected pursuant to this Instruction will be kept confidential, to the greatest extent possible, in accordance with applicable law and a thorough and fair process. Individuals may choose to remain anonymous when reporting an incident of harassment to OEC and during the informal EEO pre-complaint process. Anonymity may, however, limit the ability of the NCUA to conduct an effective inquiry. In addition, as an employer NCUA may be required to disclose certain information to individuals who have an official need to know due to the nature of the allegations, or to third parties as required by law or regulation. As such, absolute confidentiality may not be guaranteed in all cases. Documents containing information collected during an inquiry or investigation of such allegations will be stored consistent with personally identifiable information security standards, as set forth in NCUA Instructions.

- B. **EEO Complaint Process.** In addition to the procedures set forth in this Instruction to report harassment through the Internal NCUA Process for Harassment Reports, NCUA employees may also file a harassment complaint under the discrimination complaint procedures of Title 29 Code of Federal Regulations, Part 1614. Federal law prohibits harassment in the workplace because of race, color, sex (including sexual orientation, gender identity, and pregnancy), religion, national origin, age (40 or older), disability, genetic information, or retaliation for protected activity. It is not necessary to use the Internal NCUA Process for Harassment Reports before initiating the EEO complaint process. Employees should be mindful that using the Internal NCUA Process for Harassment Reports will not toll the 45-day time period (set out below) required to initiate the EEO process.

The first step in the complaint process requires that the individual contact the OMWI EEO Intake Line at 703-518-6325 or EEOMail@ncua.gov within 45 days of the most recent incident of harassment or retaliation. Failure to contact OMWI within the 45-day timeframe may result in the loss of the right to a remedy through the EEO complaint process. OMWI will assign the case to an EEO Counselor who will conduct an inquiry and attempt to informally resolve the matter with appropriate NCUA officials. If the matter cannot be resolved, the EEO Counselor will provide the individual with a notice of their right to file a formal complaint.

Once an individual is provided with the right to file a formal complaint, the individual may file a formal harassment complaint with OMWI. When OMWI receives the complaint, it will determine if the complaint is timely filed and acceptable for investigation. If the complaint is investigated,

OMWI will issue a Report of Investigation to the complainant and inform him or her of the right to a decision on the merits by NCUA (with or without an administrative hearing), with right of appeal to the EEOC and subsequent review by a Federal District Court. If the ultimate decision (by NCUA, EEOC, or Court) finds that harassment occurred, the complainant will be provided an appropriate remedy. For more information on the formal complaint process, visit the EEOC's website at www.eeoc.gov or contact NCUA's OMWI at 703-518-6325 or EEOMail@ncua.gov.

8. **EXPIRATION:** This instruction is effective immediately and will remain in effect until cancelled or superseded.

/s/
Larry Fazio
Executive Director

Authoring Office
OEC

ENCLOSURE 1: NCUA Anti-Harassment Process

EMPLOYEE REPORTS INCIDENT(S) TO:	PROCEED TO:
Management Official or Office of Human Resources (OHR)	Stage 1
Anti-Harassment Coordinator (AHC)	Stage 3

STAGE	WHAT HAPPENS
1	<p><u>Management Official or Office of Human Resources (OHR)</u></p> <ul style="list-style-type: none"> • Receives a report of alleged harassing behavior or observes potentially harassing conduct. • Informs the Anti-Harassment Coordinator (AHC) within three business days of receiving the report. • Provides the AHC with a copy of any written document or other information received from individual reporting harassment.
2	<p><u>Management Officials</u></p> <ul style="list-style-type: none"> • In consultation with the Anti-Harassment Coordinator, OHR, and the Office of General Counsel (OGC), if needed, consider if interim relief is necessary to protect an employee from potential harassing behavior until an investigation into the matter is complete. • Examples of interim relief include, but are not limited to: <ul style="list-style-type: none"> ◦ Issuance of a Cease and Desist Letter; ◦ Temporary reassignment of the alleged harasser to a different office/cubicle/location or supervisor; and ◦ Temporary placement of the alleged harasser in telework status.
3	<p><u>Anti-Harassment Coordinator (AHC)</u></p> <ul style="list-style-type: none"> • Receives report or becomes aware of harassing behavior. • Notifies the employee reporting harassment about investigation procedures, confidentiality, and other available avenues of redress. • Notifies management officials of reported harassing conduct or retaliation, where appropriate. • Conducts initial assessment within 10 business days of receipt of report. • Assigns the matter to Contract Investigator if necessary.
4	<p><u>Contract Investigator</u></p> <ul style="list-style-type: none"> • Conducts investigation of reported harassment, including contacting individual reporting harassment, the alleged harasser(s), collecting relevant evidence, identifying other individuals who may have relevant information and conducting interviews of witnesses. • Prepares a Report of Investigation (ROI) summarizing the facts found with potential recommendations and submits ROI to AHC.

STAGE	WHAT HAPPENS
5	<p><u>Chief Ethics Counsel and Anti-Harassment Coordinator</u></p> <ul style="list-style-type: none"> • Chief Ethics Counsel issues memorandum to appropriate management officials and OHR summarizing the findings and recommendations of the Office of Ethics Counsel. • AHC Notifies the reporting employee of the status of the Management Inquiry and next steps, as appropriate.
6	<p><u>Management Official(s)</u></p> <ul style="list-style-type: none"> • Review the Chief Ethics Counsel memorandum and the ROI and determine whether immediate and appropriate corrective action, including disciplinary action, is warranted. • Consult with OHR for appropriate corrective action, as needed. • Determine the immediate and appropriate corrective action, including disciplinary action, if any, to be taken, and the timing of that action. The immediate and appropriate corrective action depends on the severity and/or pervasiveness of the offense, the action required to end such behavior, the alleged harasser's prior disciplinary and behavior history, and other factors required by law to be considered. • Communicate the corrective action, if any, to the alleged harasser and impose that action upon him/her.
7	<p><u>Office of Human Resources (OHR)</u></p> <ul style="list-style-type: none"> • Provides support to Management Officials(s) to effectuate corrective action as determined by the Management Official(s). • Documents the corrective action taken, if any, and provides AHC and OGC with a closing memorandum documenting such action, including any decision not to act, and the date on which such action was taken, or the matter closed. • Where required, records the corrective action in the official personnel file.
8	<p><u>Anti-Harassment Coordinator</u></p> <ul style="list-style-type: none"> • Analyzes OHR and management's response to Anti-Harassment reports and any corrective action taken to ensure fairness, accountability, and consistency, and prepares an annual report concerning the Agency's response to such complaints.

Reports of harassment may be initiated by contacting any supervisor or manager, calling the Anti-Harassment Hotline at (703) 518-6613, and/or emailing the Anti-Harassment Program in-box: Anti-Harassment@ncua.gov.



Office of Minority and Women Inclusion
1775 Duke Street
Alexandria, VA 22314
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