ACTION PLAN FOR A
SAFE, FAIR, AND
INCLUSIVE WORK ENVIRONMENT
Support for Victims and Survivors

1. **HOTLINE**
   Establish a toll-free number staffed 24-hour with specialized federal and contractor staff to discreetly intake reports of harassing behavior to ensure immediate assistance for individuals in distress.

   **PROJECTED COMPLETION**
   1.31.2024

2. **COUNSELING**
   Enhance the free services currently provided by the FDIC by securing counselors with expertise related to sexual harassment and discrimination to address emotional and mental well-being.

   **PROJECTED COMPLETION**
   1.31.2024

3. **SUPPORT GROUPS**
   Connect victims with external resources such as local support groups specializing in sexual harassment support.

   **PROJECTED COMPLETION**
   12.15.2023

4. **SUPPORT PROGRAM**
   Establish support program to help survivors remain integrated in the workplace and equipped to take advantage of professional development opportunities post-harassment.

   **PROJECTED COMPLETION**
   3.31.2024
Prompt Investigation, Identification, and Correction of Current Problems

1
THIRD PARTY REVIEW
A Special Committee of the FDIC Board will conduct an independent, third party review of the FDIC’s workplace culture and response to allegations of harassment and misconduct.

PROJECTED COMPLETION
2.29.2024

2
INVESTIGATION OF BARRIERS
Engage an Equal Employment Opportunity (EEO) firm to conduct an in-depth analysis of ongoing challenges in workforce representation, as identified in the Executive Summary of the FDIC’s Annual Equal Employment Opportunity Program Status Report for Fiscal Year 2022. In accordance with Equal Employment Opportunity Commission Management Directive 715, the firm will conduct Barrier Analysis

Step Two - Investigate to Pinpoint Actual Barriers, assist the FDIC in implementing

Step Three - Eliminate Barriers, and recommend a plan to implement

Step Four - Plan Assessment. Results will be shared with employees.

PROJECTED COMPLETION
12.31.2024
3
PROMPT CORRECTIVE ACTION

If the analysis identifies a barrier that adversely affected a subset of employees, the FDIC will promptly take corrective action to address and remedy the identified harm, which may include compensatory damages in cases involving discrimination.

PROJECTED COMPLETION
Ongoing

4
COMPENSATION PRACTICES

Engage an EEO firm to conduct a review of performance-based cash awards and retention bonuses to determine if discriminatory practices exist. If any discriminatory practices exist, the FDIC will take prompt corrective action to address and remedy the identified harm, which may include compensatory damages.

PROJECTED COMPLETION
12.31.2024
<table>
<thead>
<tr>
<th></th>
<th>Repercussions for Harasser</th>
</tr>
</thead>
</table>
| 1 | **CONSEQUENCES**  
   Ensure consequences for individuals found liable of sexual harassment align with the seriousness of the misconduct.  
   **PROJECTED COMPLETION**  
   Ongoing |
| 2 | **TABLE OF PENALTIES**  
   Consider expanding the use of tables of penalties or other tools or framework to ensure that disciplinary action is consistently applied for like or similar misconduct.  
   **PROJECTED COMPLETION**  
   7.31.2024 |
| 3 | **NO ENTRY FOR HARASSER**  
   To the extent legally supportable and feasible, implement policies to prohibit hiring those who have previously engaged in sexual harassment or other serious misconduct (including procedures to ensure due diligence in hiring), or establish procedures to safeguard employees if the law prohibits such actions.  
   **PROJECTED COMPLETION**  
   7.31.2024 |
4
REMOVE BONUS OPPORTUNITY
Update policies to prohibit the payment of bonuses to any individual found to have committed sexual harassment and to delay bonuses for any employee being investigated for sexual harassment or other serious misconduct, until they are cleared of any wrongdoing. Determine whether other actions are appropriate for individuals found to have engaged in sexual harassment (e.g., demotion, restricting promotion opportunities).

PROJECTED COMPLETION
6.30.2024

5
RISK ASSESSMENT
Assess whether any aversion to risk, including litigation risk, associated with taking adverse personnel actions unduly impacts addressing sexual harassment or other serious misconduct in a manner that aligns with organizational values.

PROJECTED COMPLETION
4.30.2024
Leadership Accountability

1. WITHHOLDING BONUSES
Update applicable criteria and withhold bonus opportunities for failure to implement or follow the FDIC Action Plan for a Safe, Fair, and Inclusive Work Environment.

PROJECTED COMPLETION 7.31.2024

2. PERFORMANCE STANDARDS
Update leadership performance standards to better support accountability for sexual harassment detection and prevention.

PROJECTED COMPLETION 5.30.2024

3. DIVERSITY AND INCLUSION EXECUTIVE ADVISORY COUNCIL (EAC)
Hold special meetings for the EEO firm that conducts the barrier analysis discussed above to present to EAC members, all Regional Directors, Chairs of Field Supervisor and Supervisory Examiner Councils, and the Executive Sponsor(s) of each Employee Resource Group.

PROJECTED COMPLETION Ongoing

4. TRACKING SYSTEMS
Enhance the centralized tracking system for monitoring sexual harassment claims to provide the agency with better data on the scope and nature of sexual harassment claims and improve decision making around how to best prevent and address sexual harassment.

PROJECTED COMPLETION 2.29.2024
<table>
<thead>
<tr>
<th>#</th>
<th>Policy Area</th>
<th>Description</th>
<th>Projected Completion</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Anti-Harassment Directive</td>
<td>Issue revised draft directive on anti-harassment to include a more detailed definition of sexual harassment and provide a plain language explanation of existing anti-retaliation protections for individuals who report cases of sexual harassment or otherwise expose discriminatory practices</td>
<td>2.29.2024</td>
</tr>
<tr>
<td>2</td>
<td>Harassment Complaints</td>
<td>Develop procedures and guidelines to prepare close-out letters to be issued to filers of harassment complaints.</td>
<td>3.31.2024</td>
</tr>
<tr>
<td>3</td>
<td>Student Residence Center (SRC)</td>
<td>Update policies related to SRC to establish a residence-specific code of conduct and increase monitoring by security guards in common areas. Consider implementing a Resident Assistant Program to serve as a single point of contact for any issues that arise amongst employees residing at the SRC.</td>
<td>3.31.2024</td>
</tr>
<tr>
<td>4</td>
<td>Grievance Policies</td>
<td>Review grievance policies and examine options for extending timelines for processing harassment claims to increase time for victims to file a grievance for matters associated with sexual trauma.</td>
<td>4.30.2024</td>
</tr>
</tbody>
</table>
5  
CODE OF CONDUCT
Review and update code of conduct to better reflect FDIC core values and expectations for diversity, equity, inclusion, accessibility, and belonging.

PROJECTED COMPLETION  
5.30.2024

6  
EXIT SURVEYS
Seek opportunities to enhance all exit surveys conducted at the agency to better identify harassment as a factor in an employee leaving agency.

PROJECTED COMPLETION  
6.30.2024

7  
TRAVEL POLICIES
Review travel policies to determine if any of these policies are negatively impacting the FDIC’s culture and environment. Develop needed modifications based on this assessment to improve employee’s safety and well-being, and retention.

PROJECTED COMPLETION  
12.31.2024
Training Programs

1. SEXUAL HARASSMENT TRAINING
   Conduct mandatory, “live” training on preventing and addressing sexual harassment for all employees, managers, and executives. Implement a process to regularly assess effectiveness of trainings and revise as needed.

   PROJECTED COMPLETION
   12.31.2024

2. NEW EMPLOYEE ORIENTATION
   Require training on preventing and addressing sexual harassment at new employee orientation.

   PROJECTED COMPLETION
   Ongoing
Communication and Outreach Strategy

1. INTERNAL COMMUNICATION AND OUTREACH STRATEGY
   Develop and implement internal communication and outreach strategy with the goals of informing employees, rebuilding trust through transparency, and transforming culture.
   
   PROJECTED COMPLETION 12.31.2023 • And Ongoing

2. EXTERNAL COMMUNICATION AND OUTREACH STRATEGY
   Develop and implement external communication and outreach strategy to communicate FDIC’s commitment to creating and maintaining a harassment and discrimination-free environment and restoring our stakeholders’ faith in our ability to fulfill our mission.
   
   PROJECTED COMPLETION 12.31.2023 • And Ongoing
1. **FEMALE RECRUITMENT AND RETENTION TASKFORCE**
   Create a taskforce to develop recommendations to address issues primarily impacting females in the workforce as described in the Executive Summary of the FDIC’s Annual Equal Employment Opportunity Program Status Report for Fiscal Year 2022. The Taskforce will include representation from Employee Resource Groups focused on these issues.
   
   **PROJECTED COMPLETION** 1.31.2024

2. **CULTURAL ASSESSMENT AND CHANGE**
   Conduct a culture assessment on a periodic basis to gain insight into organizational dynamics, employee engagement, and overall work environment, monitor progress in improving culture, and identify areas needing improvement.

   **PROJECTED COMPLETION** 5.30.2024

3. **EMPOWER LOCAL LEADERSHIP AND ENGAGE EMPLOYEES**
   Consider providing additional resources to supervisors, Chairman’s Diversity Advisory Councils, and Employee Resource Groups to help improve culture within their local teams while ensuring alignment with overall FDIC goals.

   **PROJECTED COMPLETION** 6.30.2024
**FDIC ACTION PLAN**

4. **AGENCY-WIDE RESOURCES**
   Conduct regular reviews of Field, Region, and Headquarters offices to ensure compliance and consistency with FDIC directives related to sexual harassment, anti-harassment, and equal employment opportunity.
   - **PROJECTED COMPLETION**: Ongoing

5. **LISTENING SESSIONS**
   Implement Safe Space Conversations Program and other facilitated listening sessions across the FDIC to foster an environment of open and respectful dialogue.
   - **PROJECTED COMPLETION**: Ongoing

6. **FIELD, REGIONAL AND HEADQUARTER REVIEWS**
   Conduct regular reviews of Field, Region, and Headquarters offices to ensure compliance and consistency with FDIC directives related to sexual harassment, anti-harassment, and equal employment opportunity.
   - **PROJECTED COMPLETION**: Ongoing

The FDIC Board of Directors chartered a Special Committee to direct and oversee an independent, third-party review of allegations of sexual harassment and interpersonal misconduct at the FDIC and any management response. The review will evaluate the FDIC’s workplace culture, including any practices that might discourage or deter reports of or responses to sexual harassment and other misconduct. This Action Plan refers to that independent, third-party review but does not refer to other actions expected to be within the scope of the Special Committee’s work. Also, the Plan does not include items projected to be within the scope of reviews conducted by the Office of Inspector General.

FDIC will meet all bargaining obligations with NTEU.