



**INTER-AMERICAN FOUNDATION**  
EMPOWERED COMMUNITIES, SUSTAINABLE RESULTS

## MEMORANDUM

Date: *12/9/2020 PAA*  
To: All Inter-American Foundation (IAF) Employees  
From: Paloma Adams-Allen, President & CEO  
  
Subject: IAF Policy on Harassment

It is the policy of the Inter-American Foundation (IAF) to provide employees a harassment-free work environment. As described below, the IAF prohibits harassment and has established procedures to prevent and promptly correct any harassment that may occur.

The IAF prohibits both (1) employment related harassment based on sex (including pregnancy and gender identity), race, color, religion, age (over 40), disability, national origin, genetic information, sexual orientation, status as a parent, and reprisal; and (2) other harassing conduct that is detrimental to a safe and effective workplace, regardless if such conduct violates EEO law. All employees, including managers and supervisors, shall receive periodic training on this policy.

Under EEO law, harassment is any verbal or physical conduct, based on race, color, religion, national origin, age, disability, sex (with or without sexual conduct), genetic information, or protected activities, that either results in a tangible employment action or is so severe and pervasive as to constitute an intimidating, hostile or offensive work environment, including, but not limited to: (1) verbal conduct that could include racial or sexual epithets, foul language, unwanted sexual flirtations, ethnic jokes, derogatory statements or slurs; (2) physical conduct that could include improper touching or assault; or (3) visual harassment that could include racially or sexually explicit or derogatory posters, cartoons or drawings, or obscene gestures.

One form of unlawful harassment is sexual harassment. Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when “1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, 2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or 3) such conduct has the purpose or effect of unreasonably interfering

with an individual's work performance or creating an intimidating, hostile, or offensive working environment.” 29 C.F.R. § 1604.11.

The following is a non-exhaustive list of examples of behaviors that may constitute harassment, including sexual harassment:

- Making offensive remarks about looks, clothing, or body parts
- Pressure for dates
- Touching in a way that may make an employee feel uncomfortable
- Telling sexual jokes, hanging sexual posters, etc.
- Epithets, slurs, negative stereotyping or threatening, intimidating, or hostile acts that relate to race, color, religion, gender, national origin, age, disability, sexual orientation, genetic information, or status as a parent
- Written or graphic material that denigrates or shows hostility or aversion toward an individual or group because of race, color, religion, gender, national origin, age, disability, sexual orientation, genetic information, or status as a parent, and that is placed on walls, bulletin boards, or elsewhere on the IAF premises, equipment, or electronic circulation of such material

Employees may also report harassment to the U.S. Geological Survey (USGS), Office of Diversity and Equal Opportunity (DEO), with which the IAF has an Inter-Agency Agreement for EEO services. Please be advised that, to be accepted as timely, a complaint of harassment must be submitted to USGS DEO within 45 days of the alleged harassing incident. For further information on the EEO process, please contact a USGS EEO Counselor at (703) 648-7770 or via Federal Relay Service (800) 877-8339.

In addition to the prohibition of harassment that violates EEO law, IAF policy also prohibits other harassing conduct that is detrimental to a safe and effective workplace. Separate and apart from the EEO complaint process employees are encouraged to report any harassment immediately to their supervisor, an appropriate management official, or directly to the Chief Operating Officer, who will make every effort to prevent or eliminate conduct before it rises to the level of unlawful harassment. Such conduct may include but is not limited to bullying, blame without justification, exclusion or social isolation, excessive micro-managing, and tampering with an employee's personal belongings.

The IAF will quickly gather the facts involved in a situation and take whatever remedial action or disciplinary action may be warranted under the circumstances. This process is administrated by the Chief Operating Officer, who, whenever a concern about harassment comes to her attention, will, within ten days, commence the following thorough and impartial process: (1) assess whether it is appropriate to trigger the expedited process, (2) determine whether the fact finding phase of that process is most appropriately conducted by internal agency personnel or an outside investigator, and (3) forward the results of the fact finding, along with her recommendation for any follow up actions, to the President and CEO for final decision on the matter. Employees or applicants may submit concerns about harassment directly to the Chief Operating Officer at LDuncan@iaf.gov.

Other possible resources available to the employees for reporting allegations of harassment include the Office of Human Resources, the grievance procedure, the Office of Special Counsel if a prohibited personnel practice is involved, the Merit Systems Protection Board if an appealable adverse action is involved, and the Office of Inspector General.

All actions taken to resolve and address issues of harassment will be kept confidential to the greatest extent possible, and retaliatory action against an employee or applicant who raises a claim of harassment, or who has witnessed harassment, will not be tolerated. The IAF will undertake immediate and appropriate corrective action, including discipline, whenever it determines that harassment has occurred in violation of the agency's policy. Any employee found to have participated in harassment of any kind, or retaliation, will be the subject of appropriate administrative or disciplinary action, which may include removal from federal service.