





5300
27 Nov 2023

MEMORANDUM

From: 
L. L. Fagan, ADM
CCG

To:  27 NOV 23
S. D. Poulin, ADM
VCG

Subj: COMMANDANT'S DIRECTED ACTIONS – ACCOUNTABILITY AND TRANSPARENCY

Ref: (a) CCG Memo of 14 Jul 2023 (Accountability and Transparency Review)

1. Commanders Intent. Every Coast Guard member must adhere to our core values of honor, respect and devotion to duty at all times. There are no exceptions. In some places in our Coast Guard, there is currently a disconnect between the workplace experience we talk about, and the experiences our people are actually having. This disconnect between the core values we revere and the actual experience of each member of our workforce harms our people, erodes their trust in leaders, and undermines our readiness to execute our missions. **We each must ensure EVERY Coast Guard workplace has a climate that deters harmful behaviors and gives everyone the positive Coast Guard experience they expect and deserve.**
2. Background. The Accountability and Transparency Review (ATR) analyzed current law, policy, processes, practices, resources, and Service culture relevant to preventing and responding to sexual assault and harassment as well as other harmful behaviors in the Coast Guard. This effort identified areas for organizational improvement in order to ensure a culture of accountability and transparency throughout the Service. The ATR team visited Coast Guard units around the country to listen to members of our workforce about their experiences and engaged with the other Services and several organizations with shared values and goals. The ATR team also examined previous studies dating from 1990 to the present, including the Culture of Respect (COR) report, as well as data from previously completed surveys. A summary of significant initiatives and policy changes implemented following these past efforts is included as enclosure (2).
3. Directed Actions. The ATR report makes clear that change is necessary. I direct the implementation of the actions described in enclosure (1) to ensure every member of our workforce has an experience aligned to our core values and free from harassment, assault, hazing, bullying, hate, or retaliation.
4. Follow Up. I direct quarterly updates on implementation of these directed actions and a one-year progress brief in November 2024.

#

Enclosures: (1) Directed Actions in Support of the Accountability and Transparency Review
(2) Completed Actions Prior to the Accountability and Transparency Review
(3) Accountability and Transparency Review Team Report, dtd Nov. 2023

ENCLOSURE 1:
DIRECTED ACTIONS IN SUPPORT OF THE ACCOUNTABILITY AND TRANSPARENCY REVIEW

The actions directed below constitute a holistic approach to addressing the issues identified in the ATR report. Many of these actions require additional resources and/or authorities to implement. Service priorities require immediate support and resource allocation for the establishment of an Integrated Primary Prevention program; improvements to Human Resources Information Technology; additional improvements to governance and oversight at the Coast Guard Academy; enhanced training and professional development for the workforce; and more robust sustained victim support. The Coast Guard will continue to work with the Department, Administration, and Congress to advocate for the authorities and investments needed to support these critical programs.

- a. *Workforce Training, Culture, and Professional Development:* Provide tailored training to help personnel, from the newest recruits to senior executives, better act upon the Service's core values, understand organizational expectations, and cultivate a positive workplace climate.
 - i. *Senior Executive ATR Implementation Summit:* Convene a Senior Executive ATR implementation summit to review critical actions and hold in-person bystander intervention training. The purpose of this summit is to ensure Senior Executive visibility of all ATR action items, affirm their role in implementation, deliver Commandant expectations of the Service, and facilitate the ability of Senior Executives to personally champion bystander intervention training. (February 2024) (ATR Line of Effort (LOE): Climate and Culture; Awareness)
 - ii. *Preparatory Course for New Recruits:* Establish a Coast Guard enlisted service preparatory course to immediately follow recruit training (before members report to their first unit) and serve as a continuation of acculturation and acclimation while providing fundamental followership/leadership training. (Brief to Vice Commandant of the Coast Guard (VCG) due no later than (NLT) 01 March 2024) (ATR LOE: Climate and Culture; Awareness)
 - iii. *Workforce In-Person Training Modules:* Develop tailored training modules on Coast Guard core values, Sexual Assault Prevention Response and Recovery (SAPRR), leadership expectations, bystander intervention training, and workplace climate. These modules should be incorporated into existing Coast Guard leadership courses (LAMS, CPOA, PCO/PXO/POPS, etc.). (Brief to VCG due NLT 01 July 2024) (ATR LOE: Climate and Culture; Awareness; Prevention)
 - iv. *Develop More Effective Career Leadership Courses:* Identify and develop phased options, including resources needed, etc., to provide Coast Guard members with additional leadership courses across their careers. (Brief to VCG due NLT 01 August 2024) (ATR LOE: Climate and Culture; Awareness; Prevention)
 - v. *Senior Leader Engagement through the 2024 Commanding Officer Conference Cycle:* Incorporate a robust leadership discussion, including case studies surrounding leadership/climate, into all 2024 Commanding Officer conferences. (Brief to VCG due NLT 31 December 2023) (ATR LOE: Climate and Culture; Awareness; Prevention)

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- vi. *Bystander Intervention Training*: Develop a plan to expand in-person bystander intervention training for all Coast Guard personnel beginning in calendar year 2025. (Brief to VCG due NLT 01 October 2024) (ATR LOE: Climate and Culture; Awareness; Prevention)
 - vii. *In-person Sexual Assault Prevention Response and Recovery (SAPRR) Training*: Develop a plan to provide in-person SAPRR training to all Coast Guard personnel beginning in calendar year 2025. (Brief to VCG due NLT 01 October 2024) (ATR LOE: Climate and Culture; Awareness; Prevention; Victim Support)
 - viii. *Online Mandated Training*: Separate SAPRR training from Resiliency Training to re-establish a stand-alone SAPRR module in the Coast Guard's online Mandated Training. (Implement NLT 01 December 2023) (ATR LOE: Climate and Culture; Awareness; Prevention; Victim Support)
- b. *Integrated Primary Prevention (IPP) Program*: Create a Coast Guard Integrated Primary Prevention Program modeled after the Department of Defense (DoD) program. Scaled implementation should begin immediately. As part of this initiative, the following additional actions are also directed:
- i. *Workforce Resiliency Organizational Structure*: Examine Coast Guard Headquarters program offices (e.g., Civil Rights, Diversity, Leadership, SAPRR, IPP, Anti-Harassment Program Office (AHPO)) for opportunities to modernize organization, ensure continuity, and optimally align capabilities. (Brief due to VCG NLT 01 March 2024) (ATR LOE: Climate and Culture; Awareness; Prevention; Victim Support)
 - ii. *Victim Recovery*: Identify and evaluate options to improve coordination and continuity of care for victims of sexual assault. (Brief due to VCG NLT 01 May 2024) (ATR LOE: Victim Support)
 - iii. *Victim Mentor*: Utilizing the existing Coast Guard Mentorship program, develop a process by which victims of sexual assault and sexual harassment can request to be paired with a mentor who has demonstrated requisite knowledge of Coast Guard SAPRR policies and procedures, and who can advise on available resources for recovery, continued service, etc. (Brief to VCG NLT 01 September 2024) (ATR LOE: Victim Support)
 - iv. *SAPRR Strategic Plan*: Publish an updated SAPRR Strategic Plan. (NLT 31 December 2023) (ATR LOE: Awareness; Prevention; Victim Support)
- c. *Core Values*: Re-emphasize the Coast Guard's core values and better incorporate them into enterprise communications, training, Command Philosophy statements, and officer/enlisted evaluations.

ENCLOSURE 1:
DIRECTED ACTIONS IN SUPPORT OF THE ACCOUNTABILITY AND TRANSPARENCY REVIEW

- i. *Core Values*: Expand the core values definitions so they are clear and less likely to be subject to individual interpretation. Set up a process to ensure that all workforce messaging reinforces the Service's core values. (Brief to VCG NLT 31 January 2024) (ATR LOE: Climate and Culture; Awareness; Prevention; Accountability; Transparency)
 - ii. *Enlisted Professional Military Education Performance Qualifications (EPQs)/ Rating Performance Qualifications (RPQs)*: Review and update EPQs/RPQs to include more robust discussion/training on core values. (Brief to VCG NLT 15 February 2024) (ATR LOE: Climate and Culture; Awareness; Prevention; Accountability; Transparency)
 - iii. *Officer Evaluation System*: Update the Officer Evaluation System to better emphasize core values. (Brief to VCG NLT 15 July 2024) (ATR LOE: Climate and Culture; Awareness; Prevention; Accountability; Transparency)
 - iv. *Enlisted Evaluation System*: Update the Enlisted Evaluation System to better emphasize core values. (Brief to VCG NLT 15 July 2024) (ATR LOE: Climate and Culture; Awareness; Prevention; Accountability; Transparency)
- d. *Accountability*: Develop policies and proposals to improve accountability within the Coast Guard. While the accountability directed actions will not address historical cases from Operation Fouled Anchor, the Coast Guard is actively responding to numerous congressional requests related to Operation Fouled Anchor and the Coast Guard Investigative Service is responsive to conducting additional inquiries as warranted. In addition, Congress requested the Department of Homeland Security (DHS) Office of Inspector General (OIG) conduct an independent investigation into the facts and circumstances surrounding Operation Fouled Anchor and subsequent Coast Guard investigations or other actions. The Coast Guard is fully committed to cooperating with these efforts and will identify any additional areas for remedial action or improvement.
- i. *Highest Grade Held*: Examine whether policy should be updated to more effectively implement the authority found in 14 U.S. Code § 2501, Grade on retirement. Review should specifically address whether the criteria is clear for determining unsatisfactory performance, addressing misconduct in a lower grade, and reopening determinations for retired officers. (Brief to VCG NLT 01 March 2024) (ATR LOE: Climate and Culture; Accountability; Transparency)
 - ii. *Characterization of Service*: Review policy and procedures to ensure that substantiated cases of sexual harassment and sexual assault are appropriately taken into account when determining characterization of service upon discharge for both officers and enlisted members. (Brief to VCG NLT 01 March 2024) (ATR LOE: Climate and Culture; Accountability; Transparency)
 - iii. *Enhancing rights of crime victims*:

ENCLOSURE 1:
DIRECTED ACTIONS IN SUPPORT OF THE ACCOUNTABILITY AND TRANSPARENCY REVIEW

- a) Develop policy to implement a “Safe-to-Report” framework that addresses certain minor misconduct if that misconduct is collateral to a sexual assault. (Brief to VCG NLT 01 March 2024) (ATR LOE: Victim Support)
 - b) Develop policy to allow a victim of sexual assault the right to be present and the right to be heard at an administrative separation proceeding where conduct related to the sexual assault is a basis for separation. (Brief to VCG NLT 01 March 2024) (ATR LOE: Victim Support)
 - iv. *Addressing Improper Conduct*: Clarify in policy the obligation of commanders to take action to address improper conduct that falls short of our core values even if it fails to establish the elements of sexual harassment, sexual assault, or other violations of the UCMJ, and clarify tools available to the commander to do so. (Brief to VCG NLT 01 March 2024) (ATR LOE: Climate and Culture; Accountability; Transparency)
- e. *Coast Guard Academy*: Improve accountability at the Coast Guard Academy.
 - i. *Academy Reporting Structure*: Make the Coast Guard Academy Superintendent a direct report to the Vice Commandant. (Brief to VCG due NLT 31 Dec 2023) (ATR LOE: Accountability; Transparency)
 - ii. *Academy Board of Visitors and Board of Trustees*: Examine roles, responsibilities, and membership of the Board of Visitors and Board of Trustees to invigorate diverse oversight of the Coast Guard Academy. Recommend improvements and associated resources to strengthen and enhance the Board of Trustees, including changes to oversight, advisory functions, and authorities. (Brief to VCG due NLT 31 March 2024) (ATR LOE: Accountability; Transparency)
 - iii. *Cadet Swab Summer*: Improve the cadet summer training program and increase the supervision of cadet leadership. (Brief to VCG due NLT 01 March 2024) (ATR LOE: Accountability; Transparency)
 - iv. *Cadet Oversight*: Increase oversight of the corps of cadets and identify the resources required for these improvements (e.g., additional company officers/company chiefs, restructuring to make additional/smaller companies, fully staffing the Commandant of Cadet division including professionals trained in the discipline of resident student management, etc.). (Brief to VCG due NLT 01 March 2024) (ATR LOE: Accountability; Transparency)
 - v. *Cadet Conduct System*: Revise the cadet conduct system for implementation in the 2024-2025 academic year, including improving overall transparency and transparency regarding retention criteria. (Brief to VCG due NLT 01 May 2024) (ATR LOE: Accountability; Transparency)

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- vi. *Victim Support*: Explore courses of action to provide expedited transfer options to allow a cadet victim access to the officer ranks. Identify any potential gaps in existing authorities to inform future legislative efforts. (Brief to VCG due NLT 01 July 2024) (ATR LOE: Victim Support)
 - vii. *Physical Security in Chase Hall*: Immediately explore options to enhance physical security throughout Chase Hall including, but not limited to, upgrading locks on cadet barracks rooms. (Brief to VCG NLT 01 January 2024) (ATR LOE: Prevention)
- f. *Information, Data, and Transparency*: Improve and centralize information available to personnel. Identify options to improve HR data collection and complete Service-wide command climate surveys to better drive accountability and transparency across the Coast Guard.
- i. *Coast Guard-wide Climate Survey*: Coast Guard units, directorates, and offices with at least 16 members must complete a DEOCS by 31 January 2024. Units which initiated a DEOCS after 01 August 2023 and completed or expect to complete the survey before 31 January 2024 need not initiate a new survey. (DCMS release ALCOAST with amplifying information NLT 15 December 2023) (ATR LOE: Climate and Culture; Accountability; Transparency)
 - ii. *Survey Analysis and Trend Development*: Explore the use of surveys (including DEOCS) and environmental/location data to develop climate trend indicators. Recommend resources and processes for commands to receive assistance in interpreting and addressing climate. (Brief to VCG due NLT 01 June 2024) (ATR LOE: Climate and Culture; Accountability; Transparency)
 - iii. *Direct Access*: Identify immediate investments to improve the functionality of Direct Access to enhance accountability/transparency across the enterprise, particularly with regards to personnel analytics and force management. (Brief to VCG due NLT 31 January 2024) (ATR LOE: Accountability; Transparency)
 - iv. *Command Transparency Toolkit*: Create a tool kit to guide commands in how and when to talk about SAPRR/climate incidents with members of their command. (Brief to VCG due NLT 01 March 2024) (ATR LOE: Climate and Culture; Transparency)
 - v. *Resources Hub*: Develop a Resources Hub for the entire workforce to have ready access to information regarding awareness, prevention, accountability, victim support, and recovery. The Resources Hub should also include resiliency resources. (Brief to VCG due NLT 01 August 2024) (ATR LOE: Prevention; Victim Support)

ENCLOSURE 2:
COMPLETED ACTIONS PRIOR TO THE ACCOUNTABILITY AND TRANSPARENCY REVIEW

The Coast Guard is committed to eradicating sexual assault and sexual harassment from the Service and supporting the victims of such crimes. To that end, the Coast Guard has implemented policies and enacted initiatives to prevent, respond to, and support victims of sexual harassment and sexual assault.

This enclosure builds on the work of the ATR to provide a comprehensive picture of Coast Guard actions, including actions on the Culture of Respect (COR) Report, in one location. The following are implemented actions, including those recommended in the original Coast Guard COR report and the follow on 2019 COR analysis.

Policies and Initiatives:

- In 2002, new policy both clarified the requirement for commands to report any allegations of rape or sexual assault to the Coast Guard Investigative Service (CGIS) for investigation, and prohibited commands from conducting unit-level investigations.
- In 2005, Victim Advocate programs were created to provide emotional support to victims during interviews, medical procedures, and potential legal proceedings.
- In 2006, CGIS formally established a distinct CGIS Sex Crimes Division with a Senior Special Agent to oversee the program.
- In 2008, a dedicated Sexual Assault Prevention Program Manager was hired to implement and oversee the day-to-day administration of the Coast Guard's Sexual Assault Prevention and Response (SAPR) Program.
- In 2011, CGIS established a cadre of specially trained and credentialed CGIS special agents, known as Family and Sexual Violence Investigators (FSVIs).
- In 2012, full-time Sexual Assault Response Coordinator (SARC) positions were created to ensure appropriate care is coordinated and provided to victims of sexual assault and to track the services provided to a victim of sexual assault from the initial report through final disposition and resolution.
- In 2013, the Sexual Assault Prevention and Response Task Force examined the Service's posture toward sexual assault in five disciplines: Education/Training, Policy/Doctrine, Investigation/Prosecution, Communications, and Climate/Culture.
- In 2014, the Coast Guard promulgated policies which advanced victims' rights, enhanced protections for new accessions, solidified accountability for retaliation, and launched a full-time Special Victims' Counsel (SVC) program. The Coast Guard was the second armed force to establish such counsel, which are deployed across the Fleet to provide dedicated legal support for victims. Additionally, the Coast Guard implemented policy requiring higher-level review of referral decisions for certain sex offenses in alignment with other military services.
- In 2017, the Vice Commandant chartered the Workforce Wellness Resilience Council (WWRC), a cross-directorate, Flag Officer and Senior Executive Service level body. The WWRC was tasked with coordinating continuous improvement efforts to address harmful behaviors (e.g., suicide and suicide attempts, alcohol misuse, domestic abuse, sexual assault).
- In 2018, the Coast Guard formalized its commitment to victims of sexual assault through the Sexual Assault Prevention, Response and Recovery (SAPRR) Strategic Plan for 2018-2022, which formalized Recovery as its own strategic goal.

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- In 2019, the WWRC chartered a standing SAPRR Subcommittee, chaired by the Deputy Commandant for Mission Support (DCMS), to reaffirm the Service's commitment to preventing and responding to sexual assault.
- In 2020, the SAPRR Subcommittee created three subgroups to accomplish objectives along five strategic goals (Climate, Prevention, Response, Accountability, and Recovery).
- In May 2021 an Organization Modification Request created the Office of Sexual Assault, Prevention, Response, and Recovery Oversight and Policy.
- In June 2022 the Coast Guard hired its first-ever Integrated Prevention Program Manager (IPPM), a civilian subject-matter expert in integrating prevention efforts across all harmful behaviors to include sexual harassment and sexual assault. The IPPM was tasked to establish the foundational elements of integrated primary prevention policies, procedures, products, and outreach to build and strengthen protective factors across the total force.
- In February 2023 the Coast Guard promulgated the Harassing Behavior, Prevention, Response, and Accountability Instruction, COMDTINST 5350.6 which provides guidance on separation, re-enlistment, and adverse personnel actions, differentiating between sexual harassment, other harassing behaviors, and hate incidents. Additionally, the Service established the Anti-Harassment Program Management Office, dedicated to eliminating harassing behaviors from the Service.
- In December 2023, the Coast Guard will modernize its military justice practice, including the expansion of the Special Victims' Counsel (SVC) and implementation of the newly established Office of the Chief Prosecutor (OCP), whose jurisdiction covers victim-centric offenses and consolidates disposition authority into a single entity for sexual assault and sexual harassment, among other covered offenses.
- The Coast Guard established policy for the documentation of sexual harassment and accountability measures implemented for supervisors (e.g., commanding officers and officers-in-charge) who fail to adequately document all sexual harassment behaviors.
- The Coast Guard established a formal mentoring program that enables members to establish mentoring relationships with others with similar interests or experience.
- The Good Order and Discipline Notice was revised to increase transparency regarding completed discrimination cases.

Training

- Chaplains are trained on the nuances of implementation of sexual assault response policy within the Coast Guard utilizing situational examples.
- Independent Duty Health Service personnel are trained on reporting, victim care, and the process to coordinate sexual assault physical exams with a qualified medical facility.
- Coast Guard leadership competencies were revised to identify leadership attributes/traits in broad categories that correlate with defined responsibility levels and required levels of expertise.
- Workforce training includes perpetrator/predator characteristics and behaviors to increase awareness and reduce victimization.
- New recruits are provided recruit rights in writing at the start of basic training.
- Personnel assigned to investigate harassing behaviors incidents now receive online training.
- In FY 2022, the Coast Guard held over 130 Bystander Intervention Training sessions, educating bystanders on sexual assault, bullying, hazing, and intimate partner violence, and empowering those bystanders to intervene when observing indicators of such behavior.

ENCLOSURE 2:
COMPLETED ACTIONS PRIOR TO THE ACCOUNTABILITY AND TRANSPARENCY REVIEW

- In addition to annual required training, the Coast Guard Academy requires all new faculty to receive a block of instruction taught by the SARC on various aspects of sexual assault, including discussions on sexual assault in military and college environments, the Uniform Code of Military Justice, various reporting requirements, methods to properly address reports of sexual assault, and how to provide specialized support to reporting victims.
- Coast Guard Academy policies were updated to expressly include Officer Candidates in reporting and response procedures and to formalize the roles, responsibilities, and procedures of the Academy's Crisis Intervention Team.
- CGIS agents participate in initial and advanced sexual assault investigations training, and staff from Coast Guard SAPRR and Coast Guard SVC facilitate interactive discussions on trauma-informed investigation considerations at the Federal Law Enforcement Training Center (FLETC).

Victim Services

- The Coast Guard continues to modernize victim services through policy provisions that ensure victims are empowered to access care while preserving reporting options. The Coast Guard established the Anti-Harassment Program Office (AHPO) to provide executable guidance to identify, investigate, stop, correct harassing behaviors, and ensure accountability.
- In 2015 the Coast Guard established a process to allow a victim of sexual assault to permanently transfer from their unit or conduct a no-fault withdrawal from training. In 2019, this policy was updated to allow a member to permanently transfer from his/her current unit if his/her dependent was the victim of sexual assault. In 2023, policy was updated once more to allow a victim to request more than one transfer if needed to preserve workplace safety.
- In 2021, recognizing that a victim receiving support from a friend or family member is vital in the aftermath of sexual assault, the Coast Guard instituted a confidant protection policy that allows victims to confide in another Coast Guard member without requiring that member to notify his/her command.
- In 2021, under the direction of the Office of Sexual Assault Prevention Response and Recovery Oversight and Policy, the Coast Guard established 12 full-time Victim Advocate Program Specialist (VAPS) positions. These civilian personnel offer support to the workforce and nearly 1,000 volunteer Victim Advocates.
- The Coast Guard Academy promotes cadet safety and wellness through the employment of dedicated VAPS, permanently stationed SVC, SARC staff, and professional mental health counselors.
- In April 2023, the Coast Guard implemented new policy requiring unit commanders and chaplains be notified before members transferred to new units after reporting a sexual assault.

United States Coast Guard

Accountability and Transparency Review Team Report



November 2023

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FOREWORD

To the U.S. Coast Guard workforce, past and present,

Sexual assault and harassment are difficult subjects. These acts disrupt the fundamental fabric of trust and safety that serve as the foundation for a cohesive community. Recent news articles highlighted how the Coast Guard failed to keep our people safe. You made it very clear to our team that these failures and lack of accountability are entirely unacceptable, and you let us know the Coast Guard *must* do something about it. You did this by attending listening sessions as we visited units around the country. You reached out to our team via e-mail, sharing your personal stories and submitting recommendations through our comment box. Your input was at the forefront of our minds as we crafted our report.

While we visited you at different locations: accession points; training centers; afloat, aviation and shoreside units – you raised common themes. You told us about the important role leadership at all levels plays in establishing a unit’s climate. You said you could tell very quickly whether the climate at a unit was good or bad. Good ones had leaders that challenged and empowered members, while bad ones often allowed harmful behaviors to slide. Yet leadership training, which would equip you with the skills to encourage a positive unit climate, was often delivered too late in your career, or not at all, and training specific to sexual assault and harassment was done via click-through online modules. You urged us to deliver engaging training with frank discussions and realistic scenarios throughout your career. Some of you spoke of not fully understanding policies and procedures for reporting, or how investigations are handled. Many of you noted there were improvements in support offered to victims, but you let us know there were still too few specialists across the Service. You also frequently cited barriers to reporting that exist and concerns about long-term career impacts for victims.

Over and over, in our listening sessions, you expressed gratitude that the conversation around sexual assault and harassment was happening and that tough questions were being asked. You made it clear that you want and expect our Service to confront this issue and make it better. You want our Service to deliver meaningful change.

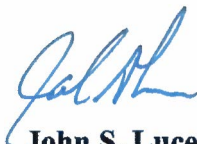
Whether you’re a member who has a story to share – or the shipmate standing beside them – this is our time. Let’s get it right.

Sincerely,

The Accountability and Transparency Review Executive Team



RADM Miriam L. Lafferty
Team Lead



John S. Luce
Deputy



CMC Ann M. Logan
Senior Enlisted Advisor

EXECUTIVE SUMMARY

Admiral Linda Fagan, Commandant of the U.S. Coast Guard, chartered the 90-day Accountability and Transparency Review (ATR) on July 14, 2023. Executive team members Rear Admiral Miriam Lafferty, Mr. John Luce and Master Chief Ann Logan led the review and conducted an analysis of current law, policy, processes, practices, resources and Service culture relevant to eradicating sexual assault and harassment in the Service to identify gaps and opportunities for improvement.

The ATR team consisted of military and civilian members from across headquarters with experience in Coast Guard policy and program development, military justice, civilian law enforcement, victim advocacy, and sexual assault prevention and response. The team relied heavily on sexual assault prevention and response experts within the Coast Guard and Department of Defense. The team sought input from across the workforce speaking with command cadre, support staff, and service members of all ranks. Furthermore, the team incorporated an anonymous comment box for members, veterans and others to submit recommendations.

The ATR presented its initial report and recommendations to the Commandant in October 2023. The report is divided into two parts. Part I of the report identifies key themes needed for actions that reaffirm our commitment to our Core Values. Part II of the report provides specific findings and recommendations along each line of effort: climate and culture, prevention, awareness, accountability and transparency, victim support and recovery. These recommendations are intended to build Service competence and capabilities related to sexual assault/sexual harassment prevention, response, and recovery.

90-DAY REVIEW

The issue of sexual assault and sexual harassment in the Coast Guard is not new. Over the course of this review, our team heard from victims¹ dating from the 1960s to the present who shared their experiences. These victims expressed deep rooted feelings of pain and a loss of trust in the organization. Recent articles, reporting on Operation Fouled Anchor² and the misconduct of a commissioned officer instructor at the Coast Guard Academy (CGA), have led people to experience feelings ranging from disappointment to outrage. This was especially true after learning about failures and lack of transparency in the Coast Guard and the CGA during those times. For so many victims, there are even deeper levels of broken trust: in leaders who failed them in preventing and responding to sexual violence; in a military justice system with antiquated legal definitions of rape; in non-existent support programs for those impacted prior to 2000. The scope of the programs started in the 2010s were not always sufficient to meet the needs of the members. The Coast Guard failed to live up to its Core Values by lacking the programs to prevent military sexual trauma and improperly supporting victims in the aftermath.

Acknowledging this broken trust is an important first step in reestablishing it. However, a report will not in and of itself rebuild trust. Building and earning trust will come through the actions of Coast Guard leaders at all levels of the organization. It must start with the Coast Guard providing opportunities for victims to tell their story. Current and future leaders will also need to understand our history and why it is vital to affect culture change. They must be provided the tools to drive change and maintain the culture of respect. This report strives to lay a roadmap for that change.

On 14 July, the Commandant established the 90-day Accountability and Transparency Review (ATR), directing a review of current law, policy, processes, practices, resources, and service culture relevant to eradicating sexual assault and harassment in our ranks. The memo set out 6 lines of effort: Climate and Culture, Prevention, Accountability, Transparency, Victim Support, and Awareness. The goal of the ATR was to respond to the Commandant's challenge question: How can the Coast Guard drive meaningful change to our culture, consistent with our Core Values, and create an environment where every member feels safe and valued?

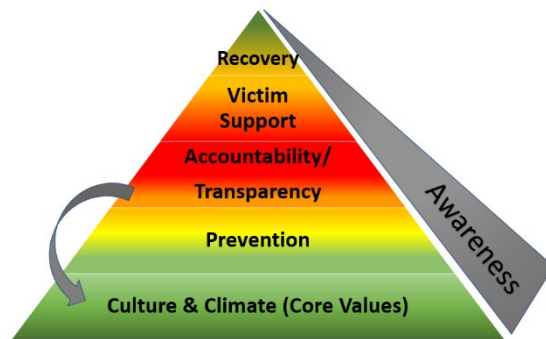
¹ Coast Guard SAPRR policy primarily uses the term *victim* for prevention and response policy and *survivor* for recovery policy. The ATR team viewed the transition from victim to survivor as an individual choice. Therefore, recognizing the agency to choose belongs with the individual, we used the term victim throughout.

² Operation Fouled Anchor was an investigation into sexual assault and sexual harassment cases at the Coast Guard Academy. See Background on pg 9 for more information.

The ATR team developed a framework to analyze the lines of effort. The foundation of this effort relies on establishing a climate and culture focused on our Core Values.

Prevention efforts build up the culture and climate at the Service and unit level to mitigate risk factors and stress that can lead to harmful behaviors. While the goal is to rid the Service of negative behaviors, in the event there is an incident, the focus shifts to ensuring a fair process with accountability and transparency at the command/unit level,

the service level, to our Congressional oversight committees, and the public, as applicable. For a victim of sexual assault, the Coast Guard must provide immediate support and work toward long-term recovery. Awareness is a cross cutting element that is involved in every level of the pyramid and ensures the entire workforce knows the resources available to them throughout the process.



This report provides a road map aimed at improving Service culture to enable us to live up to all our Core Values – Honor, Respect, and Devotion to Duty. It also describes programmatic changes needed to fortify and expand the progress the Coast Guard has made to prevent and respond to sexual assault and sexual harassment.

Initially the ATR team reviewed the Operation Fouled Anchor Final Action Memo. The team also reviewed the establishment and evolution of Coast Guard SAPRR programs. Detailed descriptions of both are found at the end of this section.

Over the course of the 90-day review, part of the ATR team traveled around the Coast Guard to listen to you. Another portion of the team reviewed numerous studies from 1990 to current, including the Culture of Respect report and data from Workforce Gender Relations (WGR) Surveys, Service Academy Gender Relations (SAGR) Surveys, and DEOMI Defense Organization Climate Survey (DEOCS).³ The entire team read the suggestions, ideas, support and criticism, and victim stories shared with us through the comment box and outreach.

The team synthesized the information gained by those efforts and examined Coast Guard authorities and policies associated with each line of effort (LOE). We benchmarked those authorities and policies against our directive to drive actionable change to guarantee the right to a safe workplace and an environment free from harassment, bullying, discrimination, retaliation, and assault, as well as the behaviors that fuel them, for all service members. Where possible, we strove to link those identified gaps with data.

³ Lisa Davis and Ashlea Klahr, "2022 Service Academy Gender Relations Survey Overview Report," Report No. 2023-021, (March 2023), Office of People Analytics.

After sifting through a mountain of data and speaking with Coast Guard members and employees, two key issues emerged:

1. Too many Coast Guard members are not experiencing the safe, empowering workplace they expect and deserve (Figure 1.2, below).
2. Trust in Coast Guard leadership is eroding (Figure 1.3, below).

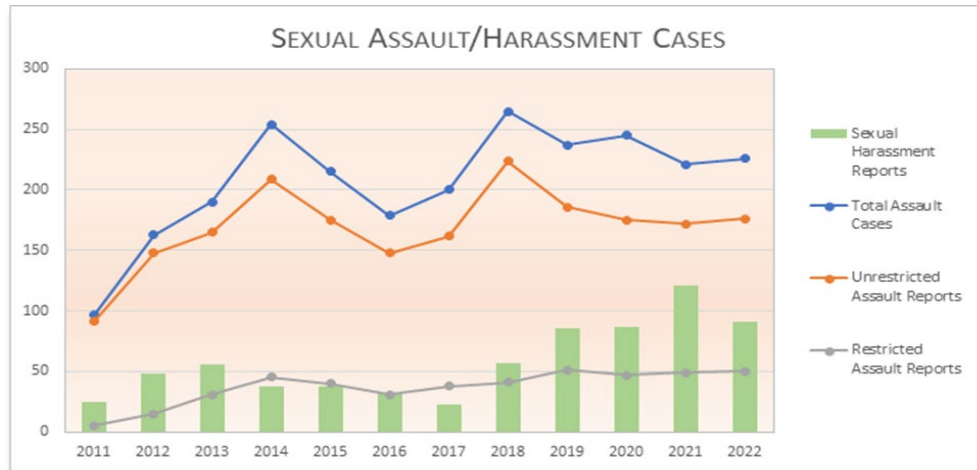


Figure 1.2: Graph Credit: WGR Survey Results, 2022

This graph depicts the number of incidents reported via the annual WGR Surveys from 2011-2022.

Trust in the Military System

If you are sexually assaulted, you can...

- Decreased trust often impacts military service as a retention issue.
- Changes recommended by IRC to military justice and response system intended to restore Service member trust.
- Prevention and climate IRC initiatives also target improved trust in the workplace

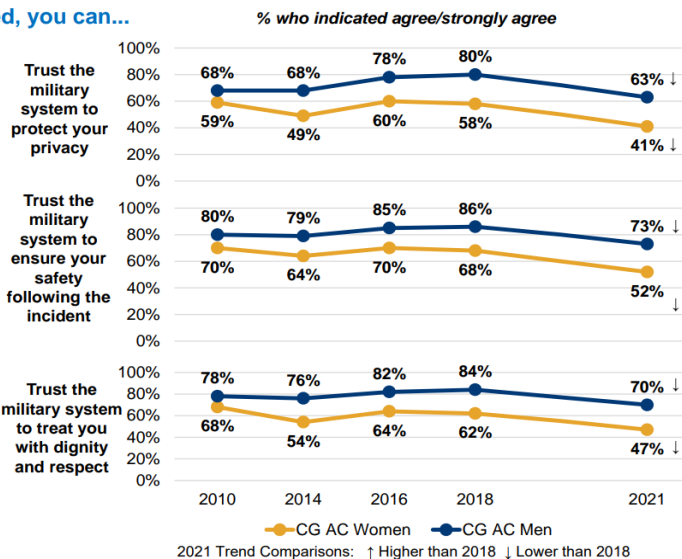


Figure 1.3: Graph Credit: WGR Survey Results, 2022

This graph shows how men and women in the Active Component feel they can trust the military system if they ever experience sexual assault based on WGR Survey data from 2010-2021. Gap in 2020 was due to COVID, no survey done.

We thought critically about how to present our findings. Many previous reports recommended setting up programs and establishing action items for headquarters offices to carry out. The ATR Team chose to take a different approach.

This report acknowledges the Coast Guard’s failures and uses them to inform a way ahead, rebuild trust, and set the baseline for organizational growth. Trust is based on two key characteristics: integrity and competence.⁴ Trust can be gained, or lost, along those two lines. For this report we considered the Coast Guard’s integrity as Core Values and framed competence to focus on the prevention, response, and recovery policies and programs. We have broadly structured our report along those lines. Part I of the report identifies key themes needed for actions that reaffirm our commitment to Core Values. Part II of the report provides specific findings and programmatic recommendations along each line of effort. We intend for these recommendations to build Service competence and capabilities related to sexual assault/sexual harassment prevention, response, and recovery.

For more information on the ATR Team’s methods of collecting information and the resources that were utilized, please see *Appendix B: Methodology*.

⁴ Dr. Peter Kim and Alexandra Solomon, “How Trust Works,” WAMU NPR, (September 2023), <https://the1a.org/segments/how-trust-works/>.

Operation Fouled Anchor Summary

Operation Fouled Anchor was a series of investigations that began in 2014 following a report of a rape that occurred at the Coast Guard Academy in 1997.⁵ During the initial investigation, CGIS learned of additional victims and “the investigation revealed that during the 1990s there appeared to be a disturbing pattern of conducting internal administrative investigations and/or initiating disenrollment for sexual misconduct instead of referring the matter for criminal investigation.”⁶

CGIS established a task force and investigated all the allegations uncovered. From September 2014 through June 2019, CGIS examined 102 separate allegations of sexual assault that occurred between 1990 to 2006, involving 43 subjects of investigations and 63 victims.⁷ Each case was evaluated for criminal action in accordance with the version of the Uniform Code of Military Justice (UCMJ) in effect at the time of the offense. Each case was further examined to determine whether the United States Coast Guard could take administrative action.

Three cases were referred to other services where CGA members subsequently joined. The Coast Guard took administrative action in two cases where evidence existed to support the allegations. The two members who were selected for promotion were prevented from promoting and, subsequently, separated from the Service. In five cases where the allegations were not supported by a preponderance of the evidence, the Coast Guard was unable to take further action. In 33 cases the accused was no longer subject to Coast Guard jurisdiction for administrative action and the applicable statute of limitations precluded either Federal or state criminal charges.⁸

To address the mishandling of cases, CGIS also interviewed 20 senior CGA officials, to include Superintendents, Assistant Superintendents, Commandants of Cadets, and Staff Judge Advocates, from the 1990-2006 timeframe who had a role in decision making related to sexual assault allegations.⁹ The CGIS interviews of 20 CGA officials were reviewed to determine whether the cases were properly handled under the requirements at the time. CGA leadership’s response to the allegations were reviewed to evaluate accountability for the handling of the cases. While no formal action was available, the report found:

Academy leadership often failed to undertake sufficient action to ensure a safe environment – particularly for female cadets – and instill a culture intolerant of any form of sexual misconduct; they did not promote and maintain a climate conduct to reporting incidents of sexual assault; and they did not adequately investigate alleged offenses as serious criminal matters and hold perpetrators

⁵ “Subj: Fouled Anchor Investigation – Final Report,” (January 2020), DCMS Memorandum, U.S. Coast Guard.

⁶ *Ibid*, 1.

⁷ *Ibid*, 2.

⁸ “Subj: Fouled Anchor Investigation – Final Report,” 3.

⁹ *Ibid*, 3.

appropriately accountable. Most importantly, the Academy too often failed to provide the support, trust, and care that is so vital for victims of sexual assault.¹⁰

On June 30, 2023, national media released a story about Operation Fouled Anchor, detailing the investigation into past sexual assaults at the Coast Guard Academy.¹¹ That same day, the Commandant of the Coast Guard sent a message to the workforce, addressing the news accounts and acknowledging that "by not taking appropriate action at the time, we may have further traumatized the victims, delayed access to care and recovery, and prevented some cases from being referred to the military justice system for appropriate accountability."

In July 2023, the Commandant testified at a U.S. Senate Committee on Commerce, Science, & Transportation Hearing titled "Budget Oversight of the United States Coast Guard."¹² At the outset of the hearing, the Chair of the Appropriations Subcommittee, Senator Baldwin, led with an impassioned statement about Coast Guard victims of sexual assault, Coast Guard failures addressed in Operation Fouled Anchor, and the pressing need for cultural change within the Coast Guard. The Commandant addressed the then-recent news reports about the Coast Guard's failure to properly respond to sexual assaults that occurred at the CGA between 1990 and 2006, apologized "to each victim, survivor, [and] their loved ones," acknowledged the Coast Guard's failure, and recognized the need to act, announcing the initiation of a 90-day accountability and transparency review.

¹⁰"Subj: Fouled Anchor Command Accountability Disposition Decision and Completion of Consolidation Disposition Authority Duties," (August 2019), DCMS Memorandum, U.S. Coast Guard, 7.

¹¹ Blake Ellis et al., "Criminal Investigation into Coast Guard Academy Revealed Years of Sexual Assault Cover-ups," (June 2023), CNN.

¹² U.S. Senate Committee on Commerce, Science, and Transportation, "Budget Oversight of the United States Coast Guard," (July 2023), <https://www.commerce.senate.gov/2023/7/budget-oversight-of-the-united-states-coast-guard>.

Establishment and Evolution of Sexual Assault Prevention, Response and Recovery (SAPRR) Programs since the Period of Operation Fouled Anchor

Much has evolved in the Coast Guard since the period of time covered by Operation Fouled Anchor. The Coast Guard has taken significant steps in investigating and addressing allegations of sexual assault and sexual harassment and supporting the victims. The following list, while not exhaustive, is illustrative of the Service's efforts to date.

Policies and Initiatives

- In 2002, new policy clarified the requirement for commands to report any allegations of rape or sexual assault to the CGIS for investigation, and prohibited commands from conducting unit-level investigations.¹³
- In 2005, Victim Advocate programs were created to provide emotional support to victims during interviews, medical procedures, and legal proceedings.¹⁴
- In 2006, CGIS formally established a distinct CGIS Sex Crimes Division led by a Senior Special Agent to oversee the program.
- In 2008, a dedicated Sexual Assault Prevention Program Manager was hired to implement and oversee the day-to-day administration of the Coast Guard's Sexual Assault Prevention and Response (SAPR) Program.¹⁵
- In 2010, a Sexual Assault Response Coordinator (SARC) billet was established at the CGA.
- In 2011, CGIS established a cadre of specially trained and credentialed CGIS special agents, known as Family and Sexual Violence Investigators (FSVI).
- In 2011, the Vice Commandant chartered the SAPR Task Force to recommend enhancements to the Coast Guard's SAPR program. The SAPR Task Force had workgroups that focused on Education/Training, Policy/Doctrine, Investigations/Prosecutions, Communication, and Workplace Climate/Culture. The Task Force issued their final report in October 2012 and, among other things, led to the establishment of the Sexual Assault Prevention Council (SAPC).¹⁶
- In 2012, SARC positions were created for each district to ensure appropriate care was coordinated and provided to victims of sexual assault. SARCs track the services provided to a victim of sexual assault from the initial report through final disposition and resolution.¹⁷

¹³ "Commandant Instruction 1754.10A, Reporting Rape and Sexual Assault" (1999), U.S. Coast Guard.

¹⁴ "Commandant Instruction 1754.10B, Reporting and Responding to Rape and Sexual Assault Allegations" (2004), U.S. Coast Guard.

¹⁵ "Sexual Assaults: Expedited Transfer and Special Victims Counsel Program," (June 2015), U.S. Coast Guard.

¹⁶ "Subj: Sexual Assault Prevention and Response (SAPR) Task Force (TF) Final Report, memo 1754," (October 2012), CG-11, U.S. Coast Guard.

¹⁷ "Commandant Instruction 1754.10D, Sexual Assault Prevention and Response" (2012), U.S. Coast Guard.

- In 2013, the SAPR Task Force examined the Service’s posture toward sexual assault in five discipline areas: Education/Training; Policy/Doctrine; Investigation/Prosecution; Communications; and Climate/Culture.¹⁸
- In 2014, empowered through the NDAA, the Coast Guard promulgated policies which advanced crime victims’ rights, enhanced protections for new accessions, solidified accountability for retaliation, and launched a full-time Special Victims’ Counsel (SVC) program.¹⁹ The Coast Guard was the second armed force to establish such counsel, which are deployed across the Service to provide dedicated focus and legal support for victims. Additionally, Coast Guard policy requiring higher-level review of referral decisions for certain sex offenses in alignment with other military services.
- In 2015, 10 USC 1565b was amended to add SVCs (Victims of sexual assault: access to legal assistance and services of Sexual Assault Response Coordinators and Sexual Assault Victim Advocates) as a victim service.²⁰
- In 2015, the Coast Guard began a series of investments to enhance the proficiency of military justice practice in the Coast Guard. These investments occurred across all aspects of military justice: prosecution, defense, appellate government and defense, trial judiciary, and appellate judiciary. In 2017 prosecution functions for significant cases were consolidated at the Legal Service Command.²¹
- In 2017, the Vice Commandant chartered the Workforce and Wellness Resiliency Council (WWRC), a cross-directorate, Flag Officer and Senior Executive Service level body.²² The WWRC was tasked with coordinating continuous improvement efforts to address troubling behaviors (e.g., suicide and suicide attempts, alcohol misuse, domestic abuse, sexual assault).
- In 2018, the Sexual Assault Prevention, Response and Recovery (SAPRR) Strategic Plan for 2018-2022 formalized the Coast Guard’s commitment to the long-term recovery and resilience of victims through the establishment of recovery as its own strategic goal.
- In 2019, the WWRC chartered a standing SAPRR Subcommittee, chaired by the Deputy Commandant for Mission Support (DCMS), to carry on the work of the SAPC and reaffirming the Service’s commitment to preventing and responding to sexual assault.²³

¹⁸ “Sexual Assaults: Expedited Transfer and Special Victims Counsel Program,” (June 2015), U.S. Coast Guard.

¹⁹ “SITREP ONE: U.S. Coast Guard Military Campaign for Sexual Assault Prevention and Response,” (ALCOAST 298/13: July 2013), U.S. Coast Guard; U.S. Congress, United States Code: Uniform Code of Military Justice, 10 U.S.C. §§ 1044d.

²⁰ U.S. Congress, United States Code: Uniform Code of Military Justice, 10 U.S.C. §§ 1565b, (2015).

²¹ “Annual Report of the Judge Advocate General of the Coast Guard” for Fiscal Years 2015, 2016, and 2017 available at: https://www.armfor.uscourts.gov/ann_reports.htm

²² Vice Commandant, “Workforce Wellness and Resiliency Council (WWRC) Charter,” (October 2016), U.S. Coast Guard.

²³ Vice Commandant, “Workforce Wellness and Resiliency Council (WWRC) and Sexual Assault Prevention, Response, and Recovery Committee Charter,” (March 2019), U.S. Coast Guard.

- In 2020, the SAPRR Committee created three subgroups to accomplish objectives along five strategic goals (Climate, Prevention, Response, Accountability, and Recovery).²⁴
- In May 2021 an Organization Modification Request created the Office of Sexual Assault, Prevention, Response, and Recovery Oversight and Policy (CG-114, now CG-1K4).²⁵
- In June 2022, the Coast Guard hired its first-ever Integrated Primary Prevention (IPP) Program Manager, a civilian subject matter expert in integrating prevention efforts across all harmful behaviors to include sexual harassment and sexual assault. The IPP Program Manager will establish the foundational elements of IPP policies, procedures, products, and outreach designed to build and strengthen protective factors across the total workforce.
- In 2023, the Coast Guard promulgated a revised SAPRR Program instruction,²⁶ as well as a revised Harassing Behavior Prevention, Response, and Accountability instruction.²⁷ Additionally, the Service established the Anti-Harassment Program Management Office, dedicated to eliminating harassing behaviors from our Service.²⁸
- The Coast Guard has modernized its military justice practice, including the expansion of the SVC program²⁹ and, in 2023, establishment of the Office of the Chief Prosecutor (OCP),³⁰ whose jurisdiction covers victim-centric offenses and consolidates disposition authority into a single entity for sexual assault and sexual harassment.

²⁴ “Sexual Assault in the U.S. Coast Guard FY20,” (June 2019), U.S. Coast Guard; “Sexual Assault in the U.S. Coast Guard FY19,” (June 2018), U.S. Coast Guard.

²⁵ “Sexual Assault in the U.S. Coast Guard FY21,” (June 2020), U.S. Coast Guard.

²⁶ “Commandant Instruction 1754.10F, Sexual Assault Prevention, Response, and Recovery (SAPRR) Program,” (April 2023), U.S. Coast Guard.

²⁷ “Commandant Instruction 5350.6, Harassing Behavior Prevention, Response, and Accountability,” (Feb. 2023), U.S. Coast Guard.

²⁸ Ibid.

²⁹ U.S. Congress, United States Code: Uniform Code of Military Justice, 10 U.S.C. §§ 1044e.

³⁰ U.S. Congress, United States Code: Uniform Code of Military Justice, 10 U.S.C. §§ 1044f; U.S. Congress, United States Code: Uniform Code of Military Justice, 10 U.S.C. §§ 824a.

Victim Services

- In 2014, the Coast Guard established a process to allow a victim of sexual assault to permanently transfer from their unit or conduct a no-fault withdrawal from training.³¹ In 2019, this policy was updated to allow a member to permanently transfer from their current unit if their dependent was the victim of sexual assault.³² In 2023, policy was updated once more to allow a victim to request more than one transfer if needed to preserve workplace safety.
- In 2018, CGA established an instruction to provide cadets who file unrestricted reports of sexual assault the option to request a leave of absence from CGA.³³
- In 2021, recognizing that a victim receiving support from a friend or family member is vital in the aftermath of sexual assault, the Coast Guard instituted a confidant protection policy that allows for victims to confide in another Coast Guard member without requiring that member to notify their command.³⁴
- In 2021, under the direction of the Office of SAPRR Oversight and Policy, the Coast Guard established 12 full-time Victim Advocate Program Specialist (VAPS) positions.³⁵ These civilian personnel offer support to the workforce and nearly 1,000 volunteer Victim Advocates.
- CGA promotes cadet safety and wellness through the employment of dedicated VAPS, permanently stationed Special Victims' Counsel, SARC staff, and professional mental health counselors.
- In FY 2022, the Coast Guard held over 130 Bystander Intervention Training sessions, educating bystanders on sexual assault, bullying, hazing, and intimate partner violence, and empowering those bystanders to intervene when observing indicators of any such behavior.
- The Coast Guard continues to modernize victim services through policy provisions that ensure victims are empowered to access care while preserving reporting options. Coast Guard established the Anti-Harassment Program Office (AHPO)³⁶ in 2023 to provide executable guidance to identify, investigate, stop, correct harassing behaviors, and ensure accountability.

³¹ "Sexual Assaults: Expedited Transfer and Special Victims Counsel Program FY15 ," (June 2014), U.S. Coast Guard.); *see also* SAPR Initial Guide was issued in 2014.

³² "Commandant Instruction M 1000.8A, Military Assignments and Authorized Absences," Sec. 1.A.17, MILITARY ASSIGNMENTS AND AUTHORIZED ABSENCES, COMDTINST M1000.8A.

³³ "Superintendent Instruction 1754.3, Subj: Procedures and Instructions for Cadet Victims of Sexual Assault to Request Leaves of Absence,' (October 2018), U.S. Coast Guard Academy.

³⁴ "Commandant Note 1754, Subj: Sexual Assault, Prevention, Response and Recovery (SAPRR) Policy Update: Sexual Assault Victim Confiding in Another Person," (ALCOAST 292/20, July 2020), U.S. Coast Guard, <https://www.dcms.uscg.mil/Portals/10/CG-1/cg111/docs/SAPR/ALCOAST%20292.PDF.pdf?ver=2020-08-03-162022-363>.

³⁵ "Sexual Assault in the U.S. Coast Guard FY21, Report to Congress," (November 2022), U.S. Coast Guard, https://www.dcms.uscg.mil/Portals/10/Sexual%20Assault%20in%20the%20U_S_%20Coast%20Guard%20%28FY%202021%29.pdf.

³⁶ "Commandant Instruction 5350.6, Subj: Harassing Behavior Prevention, Response, and Accountability," (Feb. 2023), U.S. Coast Guard.

- In addition to annual required training, new faculty at CGA receive a block of instruction taught by the SARC on various aspects of sexual assault, including discussions on sexual assault in military and college environments, UCMJ, various reporting requirements, methods to properly address reports of sexual assault, and how to provide specialized support to reporting victims. CGIS agents participate in initial and advanced sexual assault investigations training, and staff from SAPRR and SVC facilitate interactive discussions on trauma-informed investigation considerations at the Federal Law Enforcement Training Center (FLETC).³⁷

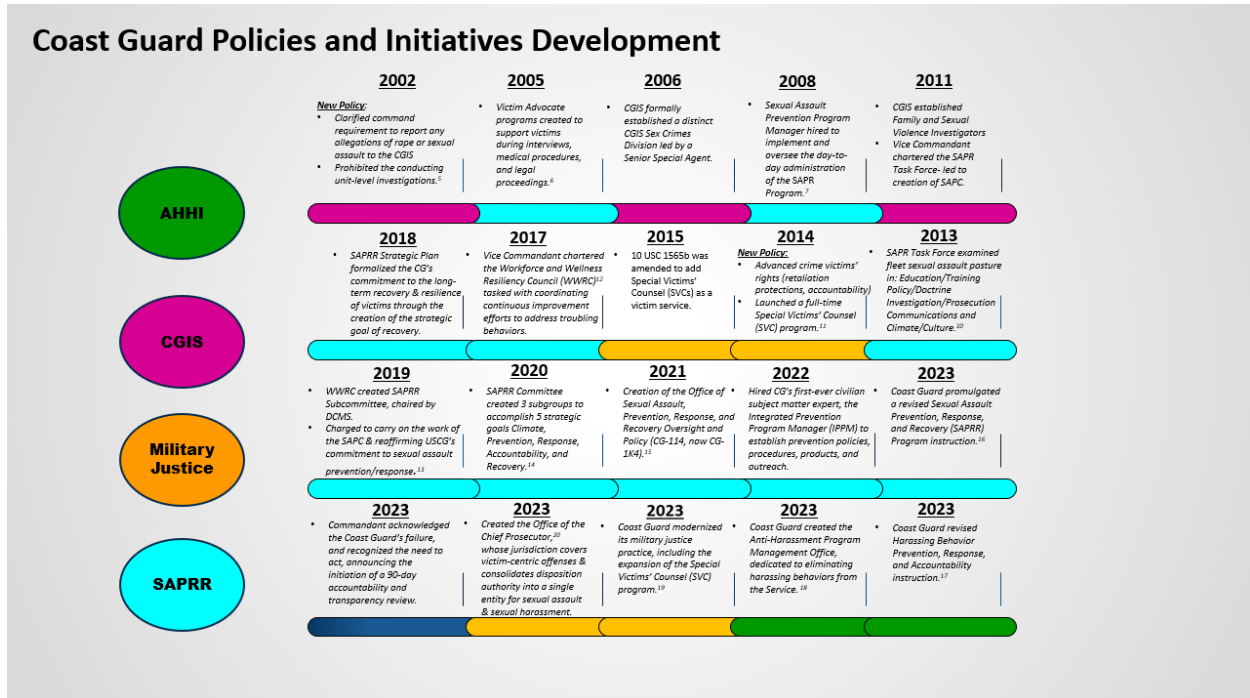


Figure 1.1: Coast Guard Policies and Initiatives Development

³⁷ "Commandant Instruction 1754.10f, Sexual Assault Prevention, Response and Recovery (SAPRR) Program," (April 2023) U.S. Coast Guard, 1-4, [https://www.dcms.uscg.mil/Portals/10/CG-1/cg111/docs/SAPR/SAPRR%20COMDTINST%201754.10F%20\(14APR23\).pdf?ver=LGzgN-1KotB_YLjpYr0-gA%3D%3D](https://www.dcms.uscg.mil/Portals/10/CG-1/cg111/docs/SAPR/SAPRR%20COMDTINST%201754.10F%20(14APR23).pdf?ver=LGzgN-1KotB_YLjpYr0-gA%3D%3D).

PART I: KEY THEMES

Prevention and Intervention – Increasing Focus on Prevention.

Harassment, sexual harassment, sexual assault, and the attitudes and actions that fuel them occur along a continuum of harmful behavior that results from an underlying workplace disorder that permits harmful sexualized workplace conduct.³⁸

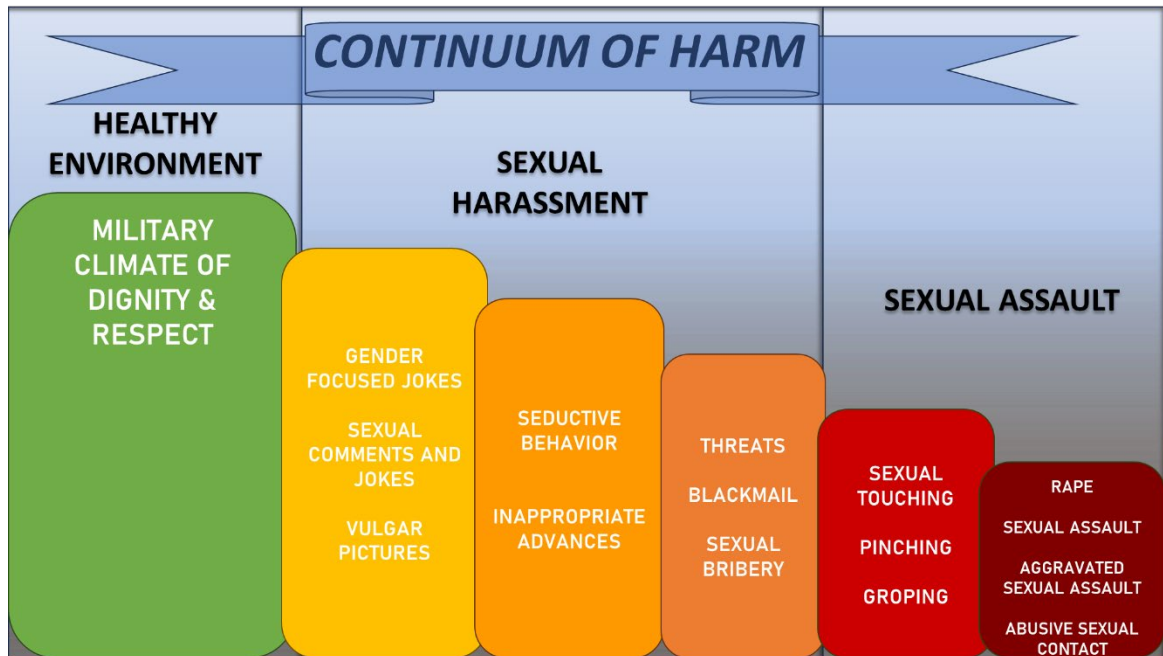


Figure 1.4: Graphic inspired by Air Force Wounded Warrior Project, 2022

³⁸ “The Relationship Between Sexual Assault and Sexual Harassment in the U.S. Military: Findings from the RAND Military Workplace Study,” (2021), RAND, https://www.rand.org/pubs/research_reports/RR3162.html. Examining the practical reasons, the authors stated:

Sexual harassment behaviors are more visible than sexual assault (i.e., they often occur in shared environments where there are witnesses) and, therefore, are more easily sanctioned. In contrast, sexual assaults typically occur in private with only the victim and perpetrator present. There are many more opportunities for colleagues to deliver social sanctions that communicate the unacceptability of the sexual harassment and for supervisors and commanders to deliver professional sanctions. Because sexual harassment can span from minor, inappropriate behavior to repeated, severe sexual harassment, there are also opportunities to sanction sexual harassment while the consequences are still relatively mild and more easily delivered. Sexual assault is a crime, and delivering a criminal punishment requires proof beyond a reasonable doubt; however, this level of proof is often not available in such cases. In contrast, the punishments for sexual harassment are administrative and do not require such a high evidentiary standard. As a result, a reported harassment should be more likely to result in sanctions to the perpetrator than would an accusation of sexual assault.

In addition, because sexual harassment solutions could be limited to peer delivered social sanctions or supervisor-controlled professional sanctions, the timeline for delivery can be quite fast compared with the timeline of sanctions for sexual assault delivered by the military justice system. The likelihood that a person will learn from an event and modify his or her behavior in response to a sanction increases when the punishment occurs quickly (Schwartz, Wasserman, and Robbins, 2001). Thus, paradoxically, because sexual harassment is lower on the continuum of harm, it is possible for punishment to be more certain to occur and to occur more quickly than it would for cases of sexual assault.

The Coast Guard invested significant response and legal resources in the most serious offenses along the continuum of harm. Sexual assault is a crime and criminal sanctions are necessary. However, the Coast Guard must invest more in prevention to intervene earlier while the conduct is susceptible to immediate peer intervention and correction, or supervisor engagement, through prompt and informal resolution or administrative sanction. Effective prevention strategies require intervention at the earliest stages of inappropriate or unhealthy behavior. The RAND Report on The Relationship Between Sexual Assault and Sexual Harassment in the U.S. Military³⁹ provides scientific rationale as to why the behaviors are linked and practical reasons why targeting misconduct that is lower on the spectrum of harmful behaviors is an effective means of preventing sexual harassment and sexual assault.

The Coast Guard's most effective resource to stop harassment, sexual harassment, sexual assault, and the harmful behaviors that fuel them is its people. Leaders at all levels must actively create an environment where everyone is empowered to raise concerns about unhealthy behaviors across the full continuum of harm, and all members are emboldened to act with courage in alignment with our core values. At our operational units, the Coast Guard has created policy and a culture where leaders and members are empowered to voice their concerns through operational risk management, including use of the General Assessment of Risk, or "Green Amber Red" (GAR) model.⁴⁰ The Coast Guard must consider doing the same with its workforce.

Leaders at all levels must actively create an environment where everyone is empowered to raise concerns about unhealthy behaviors across the full continuum of harm, and all members are emboldened to act with courage in alignment with our core values.

Addressing harmful behaviors earlier along the spectrum will require the Coast Guard to invest in prevention activities. Primary prevention promotes a culture of building protective factors that prevent harmful behaviors from occurring, rather than waiting to address them reactively. Primary prevention encourages skill development in areas such as: healthy behaviors, clear communication, appropriate boundary setting, help-seeking/finding resources, and promoting values of dignity and respect.

Coast Guard members need the skills and resources to raise concerns and intervene along the continuum of harm. One measure for reducing sexual assault is through bystander intervention training.⁴¹ Bystander intervention, like other skills, requires practice and dedicated training delivered by professional, SAPRR-certified instructors. Nurturing a climate where all members are emboldened to raise and resolve concerns and teaching members skills to

³⁹ Ibid.

⁴⁰ Coast Guard GAR Model, http://www.cgaux9wr.com/documents/HAZWOPER_501538/501538_Reference-GARModelRiskAssessmentWorksheet.pdf.

⁴¹ RAND, "Getting to Outcomes Handbook," (2019).

effectively intervene when they observe inappropriate behaviors can generate immediate peer delivered sanctions. This training must also be delivered by certified instructors, as improperly delivered training on bystander intervention (as well as other SAPRR subjects) can do more harm than good.

The Coast Guard's policies on harassing behaviors (harassment, hazing, and bullying) and sexual harassment mandate strong administrative sanctions through required reporting to CGIS, mandatory documentation of substantiated findings, and required initiation of separation processing. Leaders and supervisors must still take action to address improper conduct even if the misconduct does not meet the definition of harassing behaviors. However, these definitions are broad and framed in a legalistic format which increases confusion about the distinction between improper conduct and harassing behavior. The lack of clarity can work against timely and effective corrective measures.

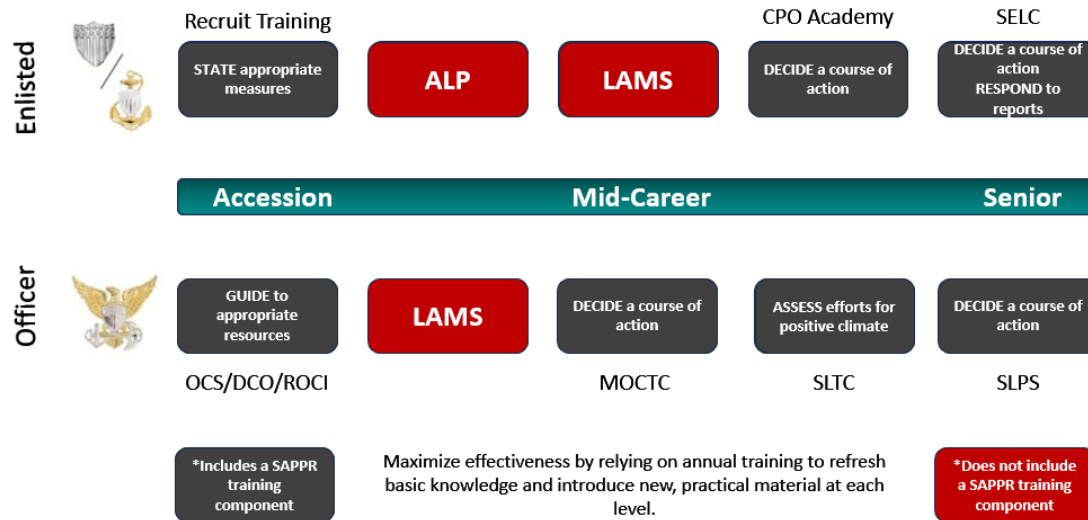
For Coast Guard members, especially young members who are new to their unit, there are limited options to seek support and assistance to resolve matters at the lowest possible level. The Coast Guard needs to provide avenues for members to seek support at their unit as well as opportunities to raise questions and receive guidance from a trained individual.

Skills Based Training and Leadership Development

The Coast Guard has not provided its members with necessary skills-based training related to the Core Values. The Coast Guard also does not have a consistent progression of SAPRR skills training across the leadership development continuum with milestones and objectives corresponding to responsibility and rank. SAPRR-related training elements generally need to happen sooner and more consistently in a member's career professional development.

- For officers, the leadership development courses are not required for promotion and existing courses have insufficient capacity. Unless an officer is selected for command and attends a pre-command course, it is possible that they would never receive SAPRR training tailored to their rank and position.
- For enlisted members, SAPRR learning, and performance objectives are not included in Apprentice Leadership Principles (ALP) or Leadership and Management School (LAMS). When SAPRR is included, the learning and performance objectives are not consistent across the courses.
- For civilians, leadership development courses are not required or widely attended.

SAPRR in the Coast Guard Leadership Continuum



ALP = Apprentice Leadership Principles; LAMS = Leadership and Management School; CPO Academy = Chief Petty Officer Academy; SELC = Senior Enlisted Leadership Course; OCS = Officer Candidate School; DCO = Direct Commission Officer; ROCI = Reserve Officer Candidate Indoctrination; MOCTC = Mid-Grade Officer and Civilian Transition Course; SLTC = Senior Leader Transition Course; SLPS = Senior Leadership Principles and Skills

Figure 1.5: Graph Credit: Force Readiness Command Training Division analysis, 2023

The training gaps are troubling. Those most at risk of experiencing improper conduct and harassment are generally younger (18-21) and junior personnel (E2-E4). The 2018 Workforce Gender Relations Survey data provides further context about the frequency of sexual harassment and sexual assault. For women and men sexual harassment typically occurred at a military installation. However, a substantial minority of women experienced sexual harassment off base (33%) or through social media or other electronic communications (25%). The vast majority of offenders were E4 to E6 and were identified as higher ranking than the victim.

The Coast Guard needs to develop a consistent progression of SAPRR skills training across the leadership development continuum with milestones and objectives corresponding to responsibility and rank. For example, at the more junior levels the skills-based training should focus on appropriate personal interactions, peer correction of behaviors, recognizing inappropriate behaviors and skills to intervene. The progression across the continuum should build upon these skills and progress for senior levels to also focus on communication and skills to establish and promote positive workplace environments.

The Coast Guard can incentivize and promote a culture of respect through performance evaluations. The Coast Guard Personnel Service Center is undertaking an effort to modernize the OER system to improve efficiency and transparency, streamline appraisal dimensions, and change the scale of measure with expectations by paygrade. As the Personnel Service Center updates performance dimensions, they should determine how to include and measure dimensions related to climate and a culture of respect.

Under the current Enlisted Performance Qualification (EPQ) Standard, harassment and sexual assault policy awareness is only required in E-2 qualifications. Further, there are no questions related to sexual assault or sexual harassment (SASH) in the current service-wide exam question bank until members seek advancement to E-7. The Coast Guard last completed an Occupational Analysis, the first step in updating Enlisted Professional Military Education (EPME), in 2014. The Coast Guard needs to consider addressing the gap in SAPRR related EPQs and service-wide exam questions throughout a member's career.

Effective Use of Survey Information

The DEOMI DEOCS⁴² and Workplace Gender Relations Surveys⁴³ contain valuable data on Coast Guard climate and Coast Guard units that the organization fails to fully use. The DEOMI DEOCS survey provides insights into members' perceptions of organizational or unit climate based on protective factors and risk factors.

Protective factors (attitudes, beliefs, and behaviors associated with positive outcomes for organizations or units) include items such as morale, work-life balance, fair treatment, supportive leadership, and transformational leadership. Risk factors (attitudes, beliefs, and behaviors associated with negative outcomes for organizations or units) include items such as presence of sexually harassing behaviors, sexist behaviors, presence of racially harassing behaviors, stress, binge drinking, workplace hostility, passive leadership, and toxic leadership.

The Workplace Gender Relations Survey⁴⁴ provides key insights regarding the prevalence and characteristics of sexual assault, sexual harassment, and gender discrimination, service member experiences with reporting these types of incidents, and perceptions of unit culture and climate. The Coast Guard needs to centrally collect and analyze the results of these surveys and trends over time to identify locations within the organization that have the highest risks. This information should be used to conduct further review of climate and tailor interventions at those locations.

Obligation to Care for Victims

The Coast Guard has an obligation to care for victims of military sexual trauma. Currently, the Coast Guard has invested in victim support programs, such as SARC, VAPS, VA, and SVC. These programs are staffed with talented and dedicated professionals and are critically important programs the Coast Guard needs to continually evaluate, improve, and further professionalize. These programs, which focus on the "Response" in SAPRR, typically end at the conclusion of administrative or judicial proceedings.

⁴² Defense Equal Opportunity Management Institute, Defense Organizational Climate Survey, <https://www.defenseculture.mil/Assessment-to-Solutions/A2S-Home/>.

⁴³ "Research & Analysis, Workplace and Gender Relations Surveys of Military Members," Office of People Analytics, <https://www.opa.mil/research-analysis/opa-surveys/workplace-and-gender-relations-survey-of-military-members>.

⁴⁴ Ibid.

The Service must devote more attention and resources to “Recovery” in SAPRR. These efforts must include investments to increase the number of behavioral health specialists, especially those with training and experience assisting victims of military sexual trauma.

*The Service must devote more attention and resources to
“Recovery” in SAPRR.*

For victims who choose to stay in the Coast Guard, there is a heavy burden placed on them to navigate an often-complex set of medical care needs and personnel programs. The Coast Guard needs to create a pathway that allows victims to be stationed in areas with accessible resources for care and appropriate jobs that will allow them to continue their career. Victims should be afforded a non-clinical case manager to ensure medical needs are being met through regular contact and assist the member in accessing available resources through civilian, military, and U.S. Department of Veterans Affairs (Veterans Affairs) options. This would likely alleviate some of the burden on victims to navigate the variety of resource avenues, access mental healthcare, and improve continuity of care. It would also provide an additional advocate after their matter has closed and SARC, Victim Advocate, or SVC are no longer assigned, and would assist with communications with commands and Personnel Service Center (PSC).

Just as victims should be offered the assistance of a non-clinical case manager to assist with medical resources, Personnel Service Center EPM and OPM should include career management counseling and personnel resource services staffed by members with detailed knowledge of and focus on personnel policies and career management issues for victims.

For victims who choose to leave the Coast Guard, the organization needs to ensure that they are supported through their transition and are aware of available resources.

PART II: LINES OF EFFORT

CLIMATE AND CULTURE

Leverage existing data to assess gaps, seams, and opportunities for our total workforce to serve in an environment free from [sexual] assault, harassment, assault, bullying, or retaliation; to feel empowered and safe to report an incident; and to have confidence in our adjudication and accountability processes.

1. Coast Guard tenets for organizational culture align with Commandant’s intent to counter sexual harassment and sexual assault. However, for too many members, especially junior members, there is a disconnect between the Core Values and their experience.
2. There are perceptions of inconsistent leadership and commitment to eradication of sexual harassment and assault. There have been incremental improvements, particularly in responding to incidents, but not a lasting or sustainable prevention effort.
3. There is a lack of consistency and focus on leadership development and Core Values across members’ careers.
4. There is a great need for accountability for behaviors spanning the continuum of harm. Existing measures and incentives promote mission completion over Core Values.

The Coast Guard established several principles which outline the desired organizational culture. These include the Coast Guard motto, core values, ethos, and creed. Based on these ideals, the Coast Guard instituted the Leadership Development Framework and the Leadership Competencies.⁴⁵

COAST GUARD’S 28 LEADERSHIP COMPETENCIES



Figure 2.1: Graph Credit: Coast Guard Office of Leadership

⁴⁵ "Coast Guard Leadership Development Framework" CG-128, U.S. Coast Guard, <https://www.dcms.uscg.mil/Our-Organization/Assistant-Commandant-for-Human-Resources-CG-1/Civilian-Human-Resources-Diversity-and-Leadership-Directorate-CG-12/Office-of-Leadership-CG-128/Leadership-Development-Framework/>

Executive leaders across the organization clearly state their desire to eliminate harmful behaviors. They do this through written statements and oral presentations. Commanding Officers and Officers in Charge usually include the concept of “Taking Care of Our People” in their Command Philosophies as vital to the unit’s success.

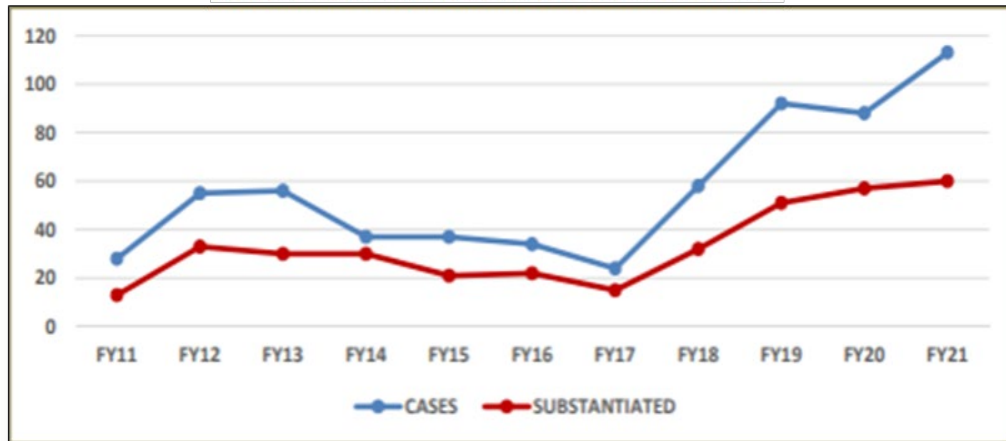
Coast Guard accession points and training centers incorporated these foundational concepts into their curricula. Anecdotally, for many Coast Guard members it’s not clear how to translate these somewhat abstract ideals into concrete applications and incorporate them into their daily lives. The Leadership and Management School (LAMS) and Midgrade Officer and Civilian Transition Course (MOCTC) course objectives include examining how personal values align with Coast Guard Core Values and ways to model ethical decision-making in leadership behaviors. There is a widespread emphasis on Devotion to Duty, which means completing the mission is the primary objective over all else.

Leadership’s vision, organizational norms and values, and prevailing workforce attitudes reflect a clear requirement and desire that our total workforce serve in an environment free from sexual assault, harassment, bullying, or retaliation. However, for too many of our members that is not the reality they have experienced.

Safe Environment

Many of the SASH and anti-harassment and hate incident (AHHI) training and education offerings note the connection between prevention and caring for our people. Despite these efforts, the Coast Guard has not seen a sustained downward trend in the number of incidences reported.⁴⁶

Sexual Harassment in the Coast Guard



⁴⁶ “Sexual Assault in the U.S. Coast Guard FY21, Report to Congress,” (November 2022), U.S. Coast Guard, https://www.dcms.uscg.mil/Portals/10/Sexual%20Assault%20in%20the%20U_S_%20Coast%20Guard%20%28FY%202021%29.pdf.

Anecdotally, the workforce is generally appalled when a senior member is found to have engaged in egregious behavior. However, the workforce is not really surprised and “watercooler talk” often includes chatter about how long the perpetrator may have engaged in similar behavior and wondering when it would finally catch up to the accused.

Going back at least as far as 1990, the Coast Guard has repeatedly expended resources studying the issues and developing recommendations. These have resulted in incremental improvements, especially focused on the “response” to incidents through accountability and victim support, but these initiatives have not led to lasting, sustainable change. Force Readiness Command (FORCECOM) determined that: “Two courses in the enlisted leadership continuum that previously included SAPRR (i.e., ALP and LAMS), have since had the lesson removed. Additionally, the 6-hour SAPRR lesson has been significantly reduced or altered in several command cadre courses.” The removal of the SAPRR content from the ALP and LAMS courses is particularly concerning since the students represent the segment of the workforce most at risk of perpetrating and/or becoming victims of sexual assault.

In a related area, in 2020, the Coast Guard issued a well-researched, comprehensive document, *Strengthening Diversity and Inclusion through Core Values*.⁴⁷ The Diversity and Inclusion Findings mirror those found regarding prevention of sexual assault and harassment: the workforce needs concise definitions in alignment with the Core Values that also demonstrate their importance to the Mission and Service; accessible information is needed up and down the chain of command; lack of awareness about existing tools and resources; lack of opportunities to engage in dialogue in a meaningful way and with regularity; and the perception that Coast Guard leadership is inconsistent in behaviors and their commitment.

This is not new. In 2012, the SAPR office recommended that the Coast Guard “Focus on the single largest alleged-offender population; the junior petty officers - via training and evaluations as they heavily influence the social and command climate for junior personnel.”⁴⁸ The SAPR office also stated that “Leadership must enforce a policy-required command climate and concentrate on instilling appropriate behaviors for these junior petty officers who wield substantial authority over the single largest victim population (non-rates).”⁴⁹ The current prevalence estimates for sexual harassment and unwanted sexual contact remain consistent.

There is a need for more significant effort to address the prevalence of incidents occurring to and by junior enlisted members and junior officers.

⁴⁷ “Diversity & Inclusion Action Plan” (June 2020), U.S. Coast Guard, <https://www.dcms.uscg.mil/Portals/10/CG-1/diversity/DIAP/Diversity-and-Inclusion-Action-Plan.pdf?ver=2020-06-25-153724-670>.

⁴⁸ “Sexual Assault Investigative Data 2008-2011,” Deputy Commandant for Mission Support, U.S. Coast Guard.

⁴⁹ Ibid.

Empowered and Safe Reporting

Climate surveys and anecdotal information indicate a lack of confidence in reporting systems. This correlates with several other deficits, including workforce confusion regarding reporting options, gaps in understanding and knowledge about accountability process outcomes, and the length of time between reporting and a command decision regarding accountability outcomes.

Climate surveys and anecdotal information indicate a lack of confidence in unit support around reporting. Members report a lack of trust that their supervisors will handle the situation appropriately and do not trust that their peers will support them. According to the 2021 CGA WGS, over 50% of the responding cadets who experienced unwanted sexual contact had been discouraged from reporting.⁵⁰ In the 2021 WGS of Active-Duty Members, of the women who filed a sexual harassment complaint, 51% of the women were encouraged to drop the issue.⁵¹ The 2021 WGS for Active-Duty members also reflects decreasing levels of trust that the military system will protect the victim's privacy, ensure the victim's safety following an incident, and treat the victim with dignity and respect.

Barriers to Reporting

Several factors impede sexual assault reporting and societal cultural norms can be unhelpful in encouraging reporting. The 2018 WGS of Active-Duty Members found that 36% of Coast Guard women who experienced sexual assault reported it to the military.⁵² Most of the women who chose not to report (78%) wanted to “forget about the incident and move on or did not want people to know.”⁵³ Victims often experience feelings of guilt or shame. This is true for both male and female victims. In the 2018 WGS of Active-Duty Members, 64% of women who experienced sexual assault felt ashamed of embarrassed.⁵⁴ “Feelings of guilt and shame that, in some way, the victim is to blame for the assault or should have fought back. This is causally

⁵⁰ “2022 U.S. Coast Guard Service Academy (USCGA) Gender Relations Survey: Overview Report, <https://www.opa.mil/research-analysis/health-well-being/gender-relations/2022-service-academy-gender-relations-survey/2022-u-s-coast-guard-service-academy-uscga-gender-relations-survey-overview-report>.

⁵¹ “2021 Workplace and Gender Relations Survey of Military Members Active Component Results and Trends” (September 2022), Office of People Analytics, Department of Defense, <https://www.opa.mil/research-analysis/health-well-being/gender-relations/2021-workplace-and-gender-relations-survey-of-military-members-reports/2021-workplace-and-gender-relations-survey-of-military-members-active-component-results-and-trends/>.

⁵² “2018 Workplace and Gender Relations Survey of Active Duty Members: Overview Report,” (May 2019), Office of People Analytics, Department of Defense, <https://www.opa.mil/research-analysis/health-well-being/gender-relations/2018-workplace-and-gender-relations-survey-of-active-duty-members-reports-infographics/2018-workplace-and-gender-relations-survey-of-active-duty-members-overview-report/>, 212.

⁵³ Ibid, 165.

⁵⁴ Ibid.

related both to the traumatic aftermath of assault and to the myth that people can control their trauma reaction.”⁵⁵

The investigation and criminal justice process is time consuming and emotionally difficult for the victim. After reporting an incident, the member will be asked to go through the event multiple times. This can be re-traumatizing as “...the victim of the assault has to describe, in very intimate detail, what happened at a time when they had lost all agency in the most profound and violent way.”⁵⁶ It is also possible that reasonable and legitimate investigative questions, can be interpreted by the victim as laying the foundations of “victim blaming.”

Military members are also concerned about how reporting might impact their careers. At a minimum, the member’s time and energy will be divided between the investigation, legal process, medical recovery, or continuing care, if any, and their job. This is bound to lead to decreased work performance and, often, an unusual assignment pattern, neither of which will be explained in a member’s performance evaluations or record.

Victims are aware of the historic lack of accountability and unlikelihood of a successful prosecution of sexual assault cases. These may be within the Coast Guard, in other military services or in the wider community. Improved accountability and transparency may help increase reporting. However, the reality of many sexual harassment and sexual assault cases is that they end with inconclusive results. In FY 2021, of the 113 sexual harassment cases, 61 were substantiated, 23 unsubstantiated and 29 cases remained open at the time of the report.⁵⁷ In FY 2021, 79 sexual assault cases opened in that year were closed: 1 resulted in Court Martial, 13 in non-judicial punishment, 19 in administrative action, and 46 in no action taken.⁵⁸ In FY 2021, 108 cases opened in prior years were closed, 13 resulted in Court Martial, 13 in non-judicial punishment, 19 in administrative action, and 46 in no action taken.⁵⁹

Collateral misconduct is a key barrier to reporting in the military. The 2018 WGS of Active-Duty Members found that 48% of women did not report a sexual assault incident “because they thought they might get in trouble for something they did and/or be labeled a troublemaker.” In January 2021, Congress, through the National Defense Authorization Act (NDAA), required the DoD to promulgate safe-to-report policy that prescribes the handling of minor collateral misconduct involving a member who is the alleged victim of sexual assault. In April 2023, the U.S. Air Force Academy expanded its safe-to-report policy to include minor collateral misconduct by witnesses and discretion in punishing collateral misconduct for cadets

⁵⁵ “Addressing Sexual Violence in the Armed Forces: A Practical Guide,” (Warsaw, 2022), OSCE Office for Democratic Institutions and Human Rights (ODIHR), <https://www.osce.org/files/f/documents/7/3/523901.pdf>, 28.

⁵⁶ *Ibid.*, 29.

⁵⁷ “Sexual Assault in the U.S. Coast Guard FY21, Report to Congress,” (November 2022), U.S. Coast Guard, https://www.dcms.uscg.mil/Portals/10/Sexual%20Assault%20in%20the%20U_S_%20Coast%20Guard%20%28FY%202021%29.pdf.

⁵⁸ *Ibid.*

⁵⁹ *Ibid.*

who report hazing, harassment and bullying as either witnesses or victims.⁶⁰ The 2021 NDAA provisions do not apply to the CGA. Coast Guard Academy Reporting and Responding to Sexual Assault Allegations at the Coast Guard Academy, SUPINST 1754.1E, August 2023 addresses collateral misconduct. The policy notes: “[g]enerally CGA will not seek to impose punishment for minor collateral misconduct that is discovered subsequent to a report of [sexual assault].” There is proposed legislation in Congress regarding collateral misconduct at the CGA.

Another fear people express is that of being thought a tattletale or a liar. Many Americans were raised not to tattle but did not take in the distinction of tattling versus reporting. Tattling is done to get someone in trouble, gain attention or hurt someone’s reputation. Reporting is done when someone seeks protection of oneself or another person.⁶¹ This socialization may contribute to the workforce misunderstanding between the concept of false reporting versus an unsubstantiated claim and a court martial proceeding not guilty finding versus innocence.⁶² This misunderstanding leads to accusers being labeled as liars. Anecdotal information shows that this misunderstanding is perpetuated by peers and colleagues both verbally and on social media. To address this misunderstanding the Coast Guard will need to overcome not only a knowledge gap, but, possibly, deeply ingrained personal beliefs.

Another potential barrier is fear of reprisal, and though this is a well-known, unauthorized, response to reporting sexual assault or harassment, it happens. The 2018 WGS of Active-Duty Members found that following reporting women experienced behaviors that met the legal criteria for professional reprisal by leadership (9%), ostracism (7%), maltreatment (4%).⁶³ Many others reported retaliatory behaviors that didn’t meet the legal criteria. Notably, an additional 28% of women who reported a sexual assault perceived experiences in line with ostracism.⁶⁴

⁶⁰ Randy Roughton, “Cadet Team Removes Assault, Harassment Reporting Barriers,” U.S. Air Force Strategic Communications, (April 2023), U.S. Air Force, <https://www.usafa.edu/cadet-team-removes-assault-harassment-reporting-barriers/>.

⁶¹ Susan Stone and Kristina Supler, “Tattletale vs. Reporter in the Cancel Culture Age,” (November 2020), KJK Student Defense, <https://studentdefense.kjk.com/blog/2020/11/11/tattletale-vs-reporter-in-the-cancel-culture-age/>.

⁶² *Research shows that rates of false reports are extremely low. There are many reasons why cases may not go to trial or there is not a conviction at trial. In neither of those instances does it mean that a victim made a false report. Nor does not taking a case to trial or an acquittal at trial mean that an accused was found “innocent.” Outcomes short of a conviction means that there was not sufficient admissible evidence to meet the extremely high bar – proof beyond a reasonable doubt – necessary to obtain and sustain a conviction in a criminal proceeding. Simply put, not guilty is not the same as innocent.*

⁶³ “2018 Workplace and Gender Relations Survey of Active Duty Members: Overview Report,” (May 2019), Office of People Analytics, Department of Defense, <https://www.opa.mil/research-analysis/health-well-being/gender-relations/2018-workplace-and-gender-relations-survey-of-active-duty-members-reports-infographics/2018-workplace-and-gender-relations-survey-of-active-duty-members-overview-report/>, 212.

⁶⁴ Ibid.

Receiving and Acting on the Report

Anecdotally, Coast Guard members may not recognize when/that a member is reporting an incident. An aggrieved member or sexual assault victim is likely to use circumspect language when first disclosing an incident. This language may not match the language members anticipate based on existing training about formal reporting elements and procedures. For example, a victim still processing a traumatic event may not describe what happened in the formulaic terms in which an offense defined.

Confidence in Our Adjudication and Accountability Process

Confidence in Coast Guard processes requires building trust across the organization. The Coast Guard has some well-defined SAPRR policy, programs, and practices. However, without committed, engaged leaders at all levels, the program fails. Commands create positive feedback loops by addressing all negative behaviors promptly and appropriately. These actions serve to improve members' trust in the command and encourages a good climate where people feel empowered to report incidents.

The Coast Guard may have well-defined SAPRR policy, programs, and practices. However, without committed, engaged leaders at all levels, the program fails.

There is an inherent tension between Coast Guard accountability and adjudication processes, which are developed with the tenet that an accused person is innocent until proven otherwise, versus efforts to increase psychological safety to report. Coast Guard procedures are designed to ensure that the accused member has due process. At the same time, a victim may feel defensiveness about possible reactions from their peers, the organization, and society for coming forward.

The Coast Guard also needs to recognize that organizational leaders and the workforce may have very different ideas about what it means to be accountable. Research shows that many leaders believe that transparency and data help build trust. However, the workforce may see accountability as a shared responsibility and “lack of accountability as a vast expanse of moral and ethical lapses”.⁶⁵ The numbers matter and having them is useful, but they do not tell the whole story.

The Coast Guard needs to actively combat a permissive environment, including inappropriate jokes, comments, and stories. Accountability needs to occur at the lowest level,

⁶⁵ Jean Johnson and Jonathan Rochkind, “Don’t Count Us Out: How an Overreliance on Accountability Could Undermine the Public’s Confidence in Schools, Business, Government, and More,” (2011), Public Agenda and the Kettering Foundation, 6.

interrupting inappropriate behavior before it progresses along the spectrum of harm. While the Coast Guard doesn't have specific measurements, anecdotally, there is a perception of inconsistent accountability for high performers.

"I think, especially in a leadership role, Respect means holding people accountable. I think if someone's not meeting the grade, or you know their performance is suffering, it's very easy to just walk by that rather than hold them accountable. But that's how they learn and grow and get better." - Participant in U.S. Coast Guard Core Values Study

Recommendations

ISSUE 1. The Coast Guard lacks an overarching program to assist leadership and members in eradicating harmful behaviors.

- **Recommendation 1:** Fully implement the IPP program. The IPP program's design incorporates leadership competencies. It also provides a one-stop shop to prevent a wide spectrum of harmful behaviors.
- **Recommendation 2:** Ensure members, particularly junior members, have skills-based training and education about boundary setting, self-advocacy, personal resiliency, healthy human sexuality, red flags, and continuum of harm.
- **Recommendation 3:** Support AHPO efforts to come up to full operating capacity. The AHPO's work addressing AHHI matters is vital to efforts to counter harmful behaviors in the Coast Guard.

ISSUE 2: There are gaps in the current leadership development continuum that allow personnel to go years without any formal leadership training that reinforces Coast Guard values and leadership standards.

- **Recommendation 4:** Analyze the existing leadership continuum. Incorporate the Leadership Development Framework and core values into all leadership training to ensure members receive leadership training & development at the right time in their career to foster a positive climate, incorporating core values, and establishing appropriate behaviors across the continuum.
- **Recommendation 5:** Analyze current accession points and leadership training to ensure inclusion of training and modeling around difficult conversations to promote accountability across the workforce and across the entire range of Coast Guard activities, not just those related to SASH and AHHI matters.
- **Recommendation 6:** Support Office of Leadership and Leadership Development Center efforts to strengthen the infusion of Leadership Development Framework in training and leadership modalities across the Coast Guard and throughout members' careers.

ISSUE 3: Supervisors need to show accountability to Core Values. This holds across the spectrum of Coast Guard activities, not just those related to SASH and AHHI matters. A positive feedback loop is created when commands are seen to address all negative behaviors promptly and appropriately. These actions are necessary prior to an escalation of behaviors leading to a SASH or AHHI matter.

- **Recommendation 7:** Review and update, as needed, awards manuals to emphasize that a member needs to have demonstrated all three Core Values to be eligible for an award. Violation of the Core Value of Respect should negate the member's eligibility for awards.
- **Recommendation 8:** Analyze existing training and development to ensure that Chiefs are empowered and able to effectively set the tone regarding the Core Values.

ISSUE 4: There is a gap between published Core Values and members holding themselves and others accountable to organizational expectations. This holds across the spectrum of Coast Guard activities, not just those related to SASH and AHHI matters.

- **Recommendation 9:** Improve accountability throughout the workforce. Accountability needs to occur at the lowest appropriate level, interrupting inappropriate behavior, and, in the case of repeated or serious infractions, be documented and reported. The Coast Guard needs to address low-risk scenarios to lay the groundwork for a professional environment. This facilitates handling of high-risk scenarios.
- **Recommendation 10:** Evaluate opportunities to incorporate concepts of ethical decision-making into elements of leadership training and education.

PREVENTION

Assess the efficacy of ongoing prevention efforts, to include a specific focus on sufficiency of training and education over a member's career, and whether appropriate resources are dedicated to this task.

1. Integrated Primary Prevention Program – DoDI 6400.11 codified the installation of IPP programs in every military branch, to include the Coast Guard.⁶⁶
2. Survey Data Analysis and Recommendations – Surveys of the Coast Guard community consistently reveal similar sentiments and experiences (regarding harmful behaviors) across the past several decades. Recommendations made as a result of the surveys also remain similar year after year, as fully invested actions intended to implement effective programming, policies, and services have not been made.
3. Training Strategies, Content, and Timing – Many Coast Guard training strategies are antiquated and not built upon on evidence-based formulas and best practice research.
4. Establish Early Intervention Resources – Early intervention reporting options do not exist for behaviors that are uncomfortable and contribute to a difficult work environment (e.g., behaviors that do not rise to the level of harassment or assault per policy definitions and standards).
5. Mental Health Screenings – Most Coast Guard community members enter the force burdened by Adverse Childhood Experiences (ACEs) that impact their coping skills, perception of the world (i.e., safety), and response to situations, yet remain unaware of the impact ACEs have on their personal mental health and workplace interactions.

It is important to establish there are three levels of “Prevention.” Primary prevention works to stop harmful behaviors before they occur. The secondary and tertiary levels of Prevention happen after the harmful event or behavior has occurred (Figure 3.1). Regarding IPP, strategies exist along a robust spectrum of activities, yet the premise is quite simple: build or strengthen protective factors that mitigate risk factors and stressors that lead to harmful behavior.

⁶⁶ “DoD Instruction 6400.11, DoD Integrated Primary Prevention Policy for Prevention Workforce and Leaders,” (December 2022), Office of the Under Secretary of Defense for Personnel Readiness, https://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/640011p.PDF?ver=_-WRNG-g78mHPx4gQwkeaQ%3D%3D.

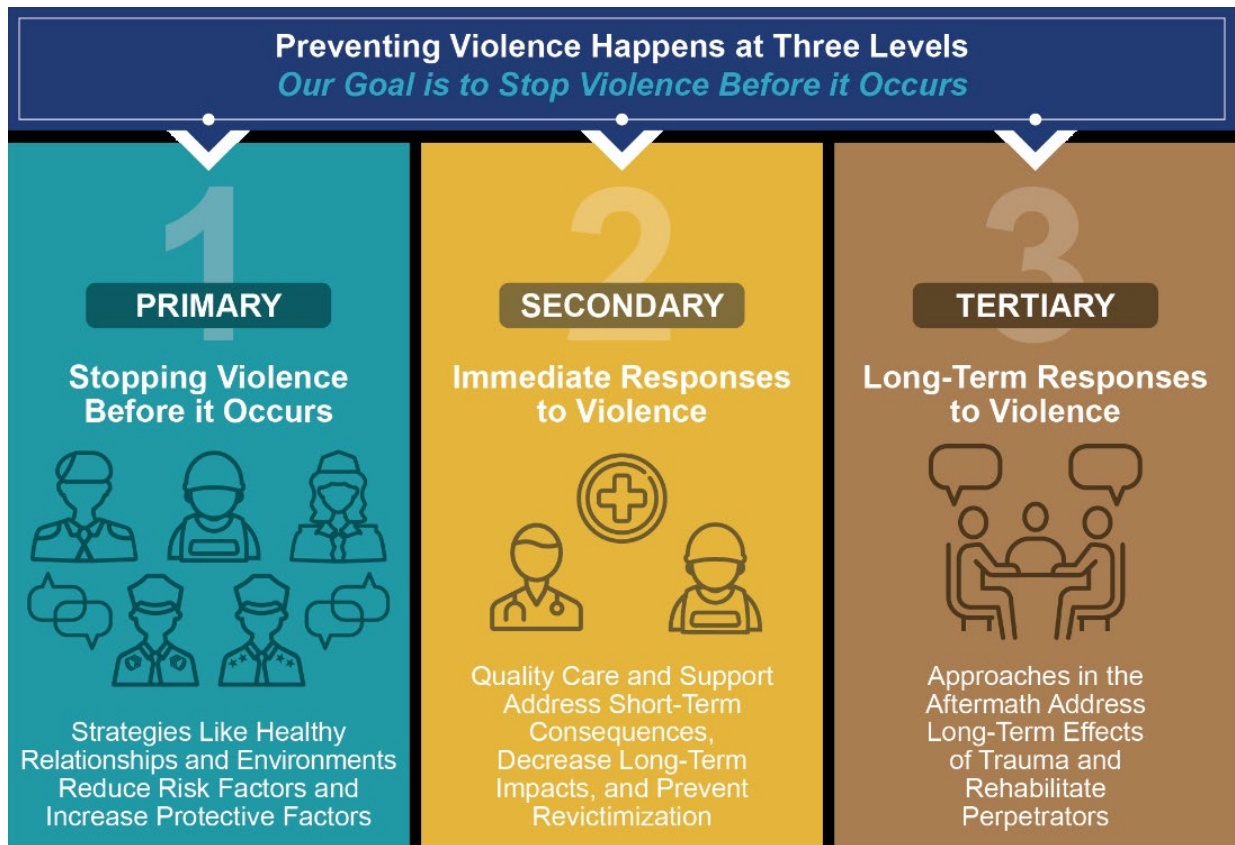


Figure 3.1: Independent Review Commission on Sexual Assault in the Military (Full Report)

Primary prevention follows the Socio-Ecological Model of Violence/Harm Reduction and operates on four different levels: individual, interpersonal, organizational, and societal levels. IPP, as practiced in the military services, focuses on the first three levels recognizing that societal efforts greatly increase the scope of efforts and require inter-connections with civilian stakeholders to effect wider change (*Figure 3.2*). It is important to note that all levels of prevention work toward long-term effectiveness by strengthening protective factors to mitigate the occurrence, or reoccurrence, and negative outcomes of harmful behaviors. For example, IPP continues to contribute as victims of interpersonal violence with strong sets of protective factors often better navigate the post-traumatic growth post-event. Additionally, when victims experience comprehensive and quality post-event response services, they can build protective factors that help in avoiding harmful coping behaviors, such as substance abuse and suicidal ideations.



Figure 3.2: DoD Office of Force Resiliency

IPP is universal primary prevention intended for the total force: service members, families, and civilians. Integrating consistent and effective prevention programming throughout the life cycle of each service member can result in increased well-being, readiness, resilience, and retention. Benefits are many and include increases in positive command climates to include civilian Coast Guard members and positive shifts in Total Force participation and uptake of healthier behaviors.

“Selective/targeted prevention” (used in primary, secondary, and tertiary prevention) aims to address protective factors and risk mitigation for specific populations identified as high-risk. It is vital to ensure appropriate and effective data collection and analysis is conducted to determine which “selective” groups would benefit from specific prevention and early intervention strategies. Note: in most cases, the Coast Guard is prepared to intervene when there is a crisis or safety concern, as indicated by the time, money, and staffing invested into these programs. However, it may be of greater benefit (*i.e.*, saves time, money, and staffing) to get “to the left” of harmful behaviors or events, and more importantly, prevent members of our community from experiencing deleterious outcomes.

Two researched and highly recommended methods to address primary prevention strategies and efforts within the Coast Guard are: (1) implementing an IPP program and (2) enhancing FORCECOM’s training efforts through evidence-based methodologies across the lifecycle of Coast Guard community members. Research and recommendations for each are highlighted in this report.

Integrated Primary Prevention Program

First, it is important to recognize two tenets from Prevention science and how they inform IPP: (1) it is easier to build a positive behavior than eliminate negative behaviors and (2) many harmful behaviors, such as sexual assault, harassment, suicidal ideation, domestic violence, child abuse, etc., share the same risk and protective factors. Thus, IPP promotes primary prevention activities that simultaneously address multiple harmful behaviors or the inclusion of prevention activities across harmful behaviors into a cohesive, comprehensive approach that promotes unity of effort, avoids unnecessary duplication, and lessens training fatigue. These efforts are comprehensive and holistic while utilizing evaluation, research, and data analytics to provide a nuanced understanding of the harmful behavior environment as well as where to best deploy resources.

...it is easier to build a positive behavior than eliminate negative behaviors and many harmful behaviors, such as sexual assault, harassment, suicidal ideation, domestic violence, child abuse, etc., share the same risk and protective factors.

The creation of an IPP program workforce provides primary prevention support to leaders and all members of the Total Force. The scope of the program includes data collection and analysis; provision of evidence-based interventions; guidance to leadership; strategy to nurture a culture of respect at every level; and raising awareness of available resources. IPP program workforce efforts also include empowering leaders with data providing evidence-based protective factor building activities that support over all well-being. (Figure 3.3).

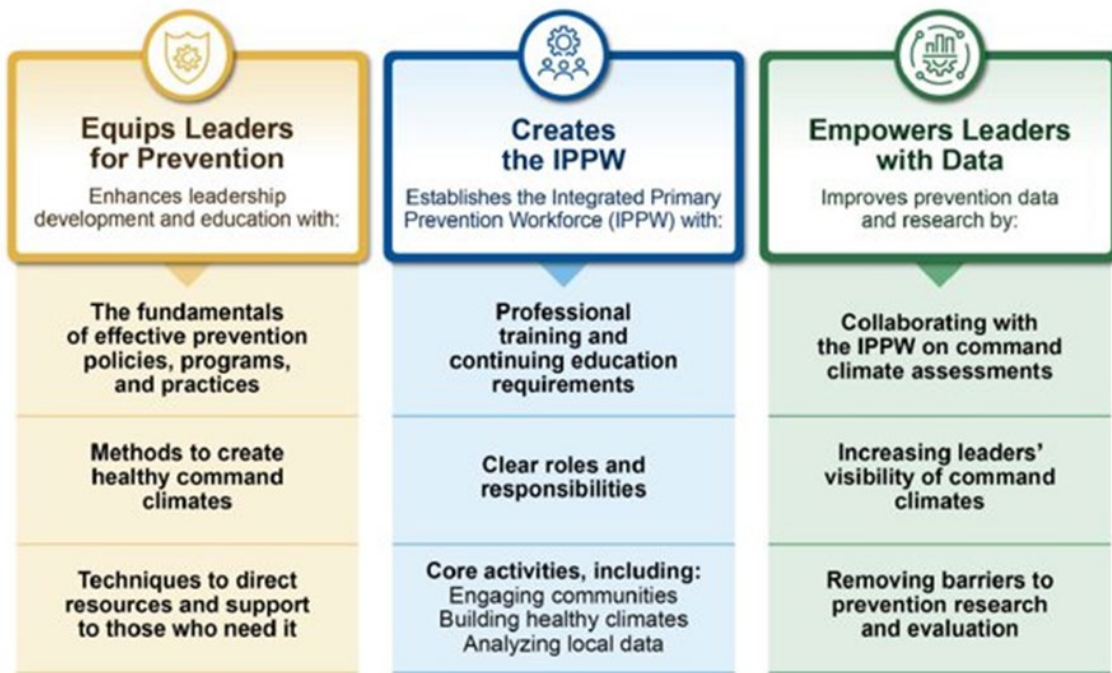


Figure 3.3: DoD Office of Force Resiliency

The IPP program workforce requires a professional team of specialists and analysts that properly understand the harmful behavior landscape (the “problem”) via data collection, develop a comprehensive approach to tackle the problem, ensure strategies are properly vetted for appropriateness, and continuously evaluate the entire process for fidelity, validity, and reliability (Figure 3.4).

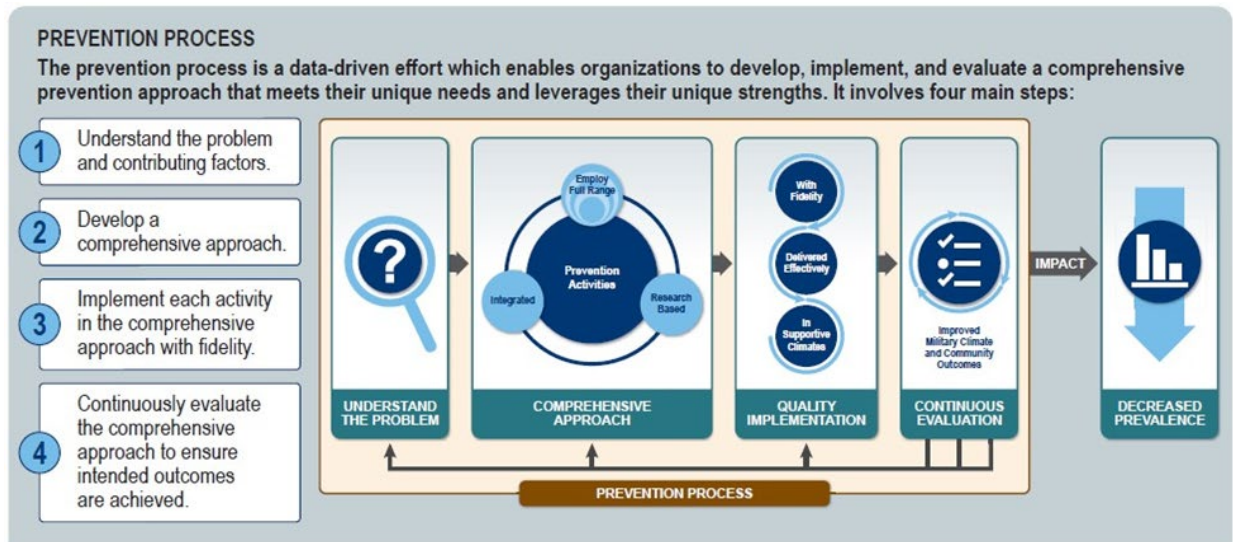


Figure 3.4: Prevention Plan of Action (PPoA) 2.0 Slicksheet

An IPP program can provide the foundational skills and empowering tools, such as healthy communication, healthy relationships, and boundary setting/maintenance that foster climates based on dignity and respect. Providing leaders with data, information, and tools to improve their environments can encourage trust in the system and proactively mitigate risk. An informed workforce, that understands bystander intervention, the Continuum of Harm, and their individual roles, can result in all members recognizing they are responsible for maintaining healthy climates. Their roles are paramount in combatting harmful behaviors and negative outcomes. An informed total force can better develop protective factors that build positive behaviors and increase the likelihood of help-seeking behavior to proactively address of mental and physical health needs.

Statutes, Regulations, and Policies

The Department of Defense (DoD) Integrated Primary Prevention Policy for Prevention Workforce and Leaders, DoDI 6400.11 (20DEC22) updated the codification of IPP program installations in every military branch, to include the Coast Guard, stating: “Applies to [Office of the Secretary of Defense (OSD)], the Military Departments (including the Coast Guard at all times, including when it is a Service in the Department of Homeland Security by agreement with that department) ...”⁶⁷ Topline messaging from the DoDI includes:

⁶⁷ “DoD Instruction 6400.11, DoD Integrated Primary Prevention Policy for Prevention Workforce and Leaders,” (December 2022), Office of the Under Secretary of Defense for Personnel Readiness,

- **Our people and mission readiness are inextricably linked.** The Department is pursuing a holistic approach of Integrated Primary Prevention aimed at preventing harmful and violent behaviors in the military community. These behaviors must be stopped both for the good of our Service members and because they detract from unit cohesion and mission readiness. By focusing on shared factors that contribute to such behaviors, the Department’s approach will foster healthier command climates, leading to enhanced readiness and a greater ability for service members to execute critical missions.
- **This Integrated Primary Prevention Policy operationalizes many of the key recommendations made by the Independent Review Commission (IRC) on Sexual Assault in the Military in 2021.**⁶⁸ The work of the IRC was pivotal in accelerating our prevention and climate efforts. The entire Department continues to work collaboratively, across OSD Components, Military Departments, and the National Guard Bureau, to operationalize the Secretary’s implementation guidance on the approved IRC recommendations and the immediate actions directed in February 2021.
- **The policy, titled “DoD Integrated Primary Prevention Policy for Prevention Workforce and Leaders,” aims to strengthen the Departments’ capability to build healthy command climates and safer communities across the Total Force.**⁶⁹ The policy outlines requirements in three critical areas: (1) Preparing our military leaders to implement primary prevention activities; (2) Establishing requirements for a full-time Integrated Primary Prevention workforce; and (3) Enhancing oversight and accountability.
- **Moving forward, leaders will be primed for prevention.** With the added support of the full-time Integrated Primary Prevention workforce, leaders can confidently harness data and best practices to make informed decisions about how best to support their people and enhance their command climates.
- **The Department of Defense is actively hiring a full-time, Integrated Primary Prevention workforce to lead integrated prevention activities.** Leading integrated prevention activities requires training in social science, public health, and/or prior experience in primary prevention. The DoD is executing a phased recruitment strategy, including hiring events and outreach efforts to veterans, military spouses, and civilians to ultimately hire more than 2,000 prevention personnel by Fiscal Year 2027.”⁷⁰
 - The DoD declared the installation of IPP programs a high priority over several years with objectives to build protective factors in the workforce, families, and community members that proactively mitigate harmful behaviors, which are both costly and deleterious to force readiness and resilience. DoD pursued resourcing based off its mandate to resource and fund its IPP program workforce, to all DoD only Military Departments. Fiscal Year 2023 budgeting for DoD IPP neared \$500 million dollars.

<https://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/640011p.PDF?ver=-WRNG-g78mHPx4gQwkeaQ%3D%3D>, Section 1, p.4.

⁶⁸ “Hard Truths and the Duty to Change: Recommendations from the Independent Review Commission on Sexual Assault in the Military,” (February 2021), <https://media.defense.gov/2021/Jul/02/200275437/-1/-1/0/IRC-FULL-REPORT-FINAL-1923-7-1-21.PDF/IRC-FULL-REPORT-FINAL-1923-7-1-21.PDF>.

⁶⁹ “DoD Instruction 6400.11, DoD Integrated Primary Prevention Policy for Prevention Workforce and Leaders,” (December 2022) <https://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/640011p.PDF?ver=-WRNG-g78mHPx4gQwkeaQ==>.

⁷⁰ “Senior Toolkit: Understanding DoDI 6400.11,” (2023), DoD Office of Force Resiliency.

- The Coast Guard, though mandated by direction of DoD to create IPP and staff an IPP program workforce, is not resourced for the requirements. The Coast Guard currently has one IPP program workforce member, a Primary Prevention Program Manager hired in June 2022, to begin to develop and build out the program. However, as of October 2023, the Coast Guard IPP program and IPP program workforce remain without resourcing. If funding is allocated for IPP to align with DoD, partnerships will be developed in all areas of the Coast Guard community. A fully functional IPP program should be a cross-cutting, collaborative system of data collection and strategic recommendations to improve policies, procedures, culture and climate across the lifecycle and trajectory of the workforce, which involves the attention and participation of the community at large (*Figure 3.5*).

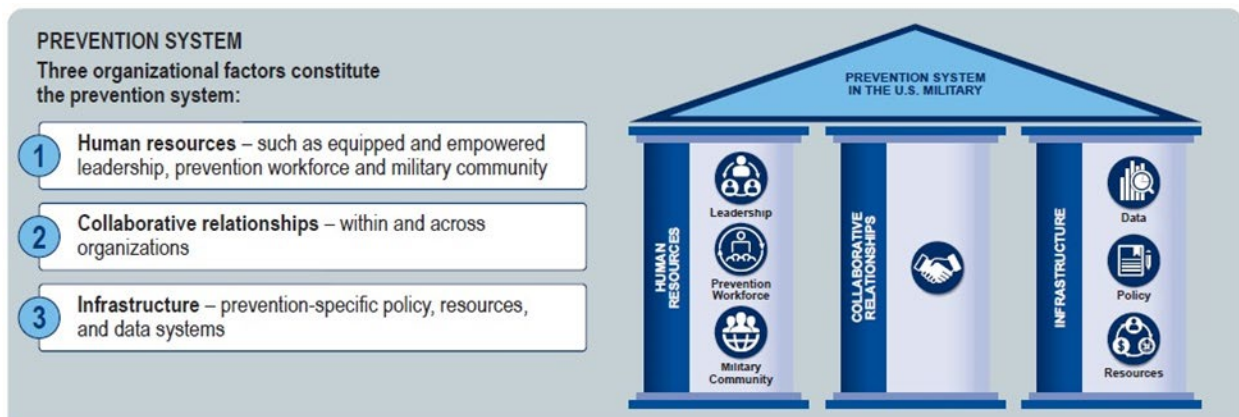


Figure 3.5: Prevention Plan of Action (PPoA) 2.0 Slicksheet

Statistics and Analysis

The Coast Guard's primary data collection tools to assess culture, climate, communication, relationships, protective and risk factors are the DEOCS, the WGR survey, SAGR survey, Academy Climate and Networking study, and On-Site Installation Evaluations (OSIE). The following is a summary of harmful behaviors that require drastic improvement in the Coast Guard and would be targets of an IPP program.

*2021 DEOCS*⁷¹ data regarding the presence of problematic behavior in the Coast Guard:

Racially Harassing Behaviors = 14%

Sexist Behaviors = 6%

Sexually Harassing Behaviors = 19%

*2022 WGR Survey*⁷² data broke down the problematic behavior further:

Unwanted Sexual Contact

4.3% Women

0.7% Men

Sexual Harassment

18.3% Women

4.2% Men

Gender Discrimination

12.6% Women

1.0% Men

The *2022 WGR Survey* also identified a negative, downward trend by all Coast Guard members on issues of trust in the system to protect privacy, ensure safety, and treat them with dignity and respect if they report a sexual assault. Numbers were also trending negatively regarding expectations of bystander intervention and the promotion of work climates based on mutual respect and trust.

2022 SAGR Survey data for CGA Cadets⁷³ regarding the prevalence of problematic behavior is extremely elevated:

Unwanted Sexual Contact

14.4% Women

2.4% Men

⁷¹ "2021 Defense Organizational Climate Survey," Office of People Analytics.

⁷² "2022 Workplace and Gender Relations Survey of Active-Duty Members: Overview Report," Office of People Analytics, Department of Defense, <https://www.opa.mil/research-analysis/health-well-being/gender-relations>.

⁷³ "2022 U.S. Coast Guard Academy (USCGA) Gender Relations Survey: Overview Report," (April 2023), Office of People Analytics, <https://www.opa.mil/research-analysis/health-well-being/gender-relations/2022-service-academy-gender-relations-survey/2022-u-s-coast-guard-service-academy-uscga-gender-relations-survey-overview-report/>.

Sexual Harassment
51% Women
21% Men

Gender Discrimination
20% Women
5% Men

Sex Based Military Equal Opportunity Violation Rate
56% Women
24% Men

The *2022 SAGR Survey*⁷⁴ results also identified preventable behaviors that are known contributing factors to these statistics: alcohol misuse, willingness to stop sexual assault and harassment, and bystander intervention.

Along this vein, the *2021 Academy Climate and Networking Study: USCGA* found “...by examining social norms, the results of this study found that while cadets have accurate expectations regarding how other cadets should behave with regard to confronting sexual comments, discouraging abusive/hostile language on social media, and discouraging humiliating others, the actual behavior of cadets does not live up to these expectations. These behaviors are promising targets for a norms intervention within an existing prevention activity. For other behaviors such as encouraging healthy drinking behavior and holding others accountable to Academy rules, cadets have lower expectations of one another. These behaviors are counter to good order and discipline at the CGA and character development programs are an opportunity to address these norms to drive behavior change...”⁷⁵

Regarding the implementation of prevention programming, “If a prevention program or activity is modified by USCGA, an important step is to evaluate the effectiveness of the program in reducing the harmful behavior the program is targeting. Without evaluating the program, it will be hard for USCGA to know if the program is making an impact on actual behavior change over time.”⁷⁶ This further directs the Coast Guard’s need to implement a fully staffed IPP program to address identified gaps within its ranks.

The DoD conducted OSIE’s at the U.S. Military, Naval, and Air Force Academies in 2023. The areas identified for improvement were prolonged stress of training environments; cynicism, distrust, and stigma for help-seeking; unequipped peer leaders/mentors; and prevention throughout the academy lifecycle. Their recommendations focused on adjustments to the peer

⁷⁴ “2022 Service Academy Gender Relations Survey Overview Report,” (March 2023), Office of People Analytics, <https://www.opa.mil/research-analysis/health-well-being/gender-relations/2022-service-academy-gender-relations-survey/2022-service-academy-gender-relations-survey-overview-report/>.

⁷⁵ “2021 Academy Climate and Networking Study - US Coast Guard Academy: Executive Report,” (August 2023), Office of People Analytics, <https://www.opa.mil/research-analysis/health-well-being/gender-relations/2021-academy-climate-and-networking-study-acns/2021-academy-climate-and-networking-study-us-coast-guard-academy-executive-report/>.

⁷⁶ Ibid.

leadership structure, improving options and messaging for help-seeking behaviors, countering misperceptions regarding reporting processes, and increasing prevention efforts.⁷⁷

These surveys and studies highlight the same, chronic issues year after year: rates of problematic behaviors are far too high, trust in the system is far too low, climates/cultures promoting mutual respect and dignity are not thriving, and peer to peer mentorship and intervention is not effective in its current form.

Finally, in addition to survey data, the DoD and Coast Guard recognized the need to emphasize the impact of Adverse Childhood Experiences (ACE) on adult mental and behavioral health. ACEs are potentially traumatic events that occur in one's childhood such as violence, abuse, mental health and/or substance misuse issues in their family, that may cause toxic stress. Toxic stress can change a child's brain development and influence their physical response to stress, which informs their interactions with the environment, decision making, and behavior as an adult. ACEs are also associated with physical ailments such as chronic health problems, mental health issues, and substance misuse. Research shows 61% of adults have at least one type of ACE and 16% had four or more ACEs.⁷⁸ ACEs are a pervasive, common-place experience; thus, ACE-informed care and leadership is vital in helping the Coast Guard community understand, recover, and thrive despite this potential vulnerability.

FORCECOM Training

FORCECOM Training Division (FC-T) conducted a rapid analysis (*Figure 3.6*) in August and September 2023 to provide actionable recommendations on the Coast Guard's continuing efforts to counter sexual assault and harassment. Throughout this analysis the FORCECOM team sought to answer the following questions:

- How effective has the Coast Guard's training been at preventing sexual harassment and assault within its ranks?
- How does the Coast Guard's approach to SAPRR training compare to industry, academia, and DoD efforts?
- How can the Coast Guard improve comprehension, confidence, and retention of knowledge and skill during and after its SAPRR training?
- How can the Coast Guard improve its ability to determine the impact of its SAPRR training?

To answer these questions the FORCECOM team conducted a rapid analysis of the Coast Guard's SAPRR training portfolio, survey data, and metrics on incidents of sexual harassment and sexual assault. This information was then benchmarked against similar data from the DoD. A

⁷⁷ "Defense Advisory Committee for the Prevention of Sexual Misconduct (DAC-PSM) Public Meeting Presentation, (September 2023)

⁷⁸ "Vital Signs," (November 2019), Centers for Disease Control and Prevention, <https://www.cdc.gov/media/releases/2019/p1105-prevent-aces.html>.

literature review captured lessons learned and best practices from industry and academic institutions. All recommendations are evidence-based on the available data.

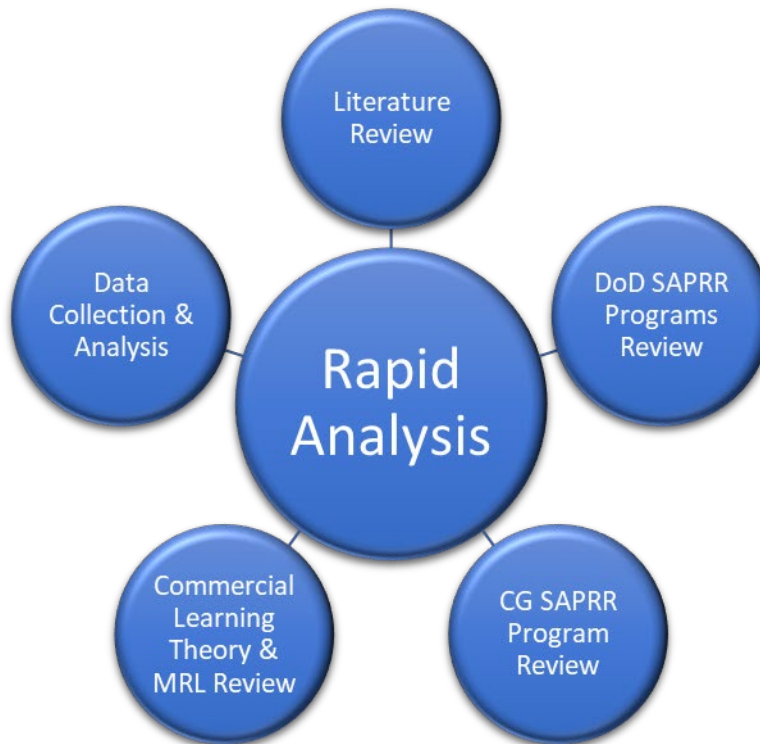


Figure 3.6: FC-T

Summary of Findings from the Rapid Analysis

Finding 1: There is not a consistent, graduated progression of SAPRR learning and performance objectives in the enlisted or officer leadership continuums.

Finding 2: There has been significant drift away from standardized content, including the reduction and removal of SAPRR training objectives, in pre-command courses.

Finding 3: Levels 1 and 3 survey⁷⁹ questions are not consistent over the years, severely limiting comparison of results.

Finding 4: Levels 1 and 3 survey data management is decentralized and unregulated. This presents significant barriers to gathering data and evaluating overall effectiveness.

⁷⁹ Level 1 and 3 refer to evaluations of courses. "Level 1 evaluations measure students' impressions of a course and the training environment (e.g., customer satisfaction survey) ...Level 3 evaluations measure whether course graduates have successfully performed the TPOs in the workplace...Level 3 evaluation data indicates whether students apply behaviors learned in the classroom in the workplace 4-6 months after graduation, i.e., knowledge transfer. Level 3 evaluation data also measures to TPO relevancy to the workplace." U.S. Coast Guard Force Readiness Command, Training Division (FC-T) Standard Operating Procedures (SOP) for The Coast Guard's Training System, Volume 3, Training Evaluation (December 2015)

Finding 5: Students are generally satisfied with SAPRR lesson content, most notably when subject matter experts facilitate the training and when delivery is through case studies and discussion instead of PowerPoint-driven lecture.

Finding 6: The Coast Guard reports its metrics to Congress differently than the DoD.

Finding 7: The Coast Guard does not have a training effectiveness plan in place to reliably determine the impact of its SAPRR training on the prevalence of assaults or opened cases.

Take aways from university-based research (references in *Appendix C*):

Finding 8: Bystander-intervention education reduces sexually violent crimes compared to groups who had not received the same education.

Finding 9: One-off, short (i.e., under 45 minutes) training sessions led by non-experts in sexual violence or training professionals cause more harm than good; women in particular feel blame, are less inclined to report, and fear reprisal after such sessions.

Finding 10: The best programs raise awareness of the problem, encourage learners to see themselves as part of the solution, create an understanding of the negative impacts of sexual violence, and allow learners to practice skills through scenarios and/or prompts out loud (i.e., vocally).

Finding 11: Bystander intervention effectiveness declines within three-months post-training; emphasizes the need to have regular refresher training.

Finding 12: Training longer than 45-minutes in length which include audience-relevant scenarios, increases learner retention and confidence to intervene.

Take aways from industry-based research (references in *Appendix D*):

Finding 13: Bystander-intervention works in military settings, though long-term studies have not been done.

Finding 14: Training should be reframed as education – thus an acquisition of new knowledge – to promote adult learner buy-in.

Finding 15: Women in leadership in male-dominant sectors are 178 times more likely to experience sexual violence; education must be company-wide, including leadership, to promote cultural change.

Finding 16: E-learning based sexual violence curriculum can elicit trainees' gender-based biases; this effect can be somewhat mitigated by including more media and interactivity in design.

Finding 17: Cultural context of the learner must be considered in design of training scenarios – one-size-fits-all role play and/or scenarios do not work.

Recommendations

The following list of recommendations is based upon the DoD's research into IPP programs, FORCECOM's rapid analysis, Coast Guard survey/assessment data, and anecdotal evidence collected from Coast Guard program subject matter experts, interviews, and small groups in the field. Objectives are best practice recommendations for implementation.

ISSUE 1: Lack of an IPP Program.

- **Recommendation 1:** Implement an IPP program workforce. Prioritize and secure IPP funding. Determine where to best house the IPP program workforce to maximize effectiveness of IPP and prevention-related programs. Identify other programs that may operate more efficiently and effectively under the IPP umbrella.
- **Recommendation 2:** Update processes for surveys and evaluations. Ensure implementation of DoDI 6400.11 Command Climate Assessment organizational and operational updates⁸⁰ Allow IPP program to handle the data, e.g., trend analysis, outreach, primary prevention command climate improvement recommendations, and follow-on pulse survey assistance (when needed) for, at a minimum, the DEOCS, WGR, and SAGR surveys. (NOTE: the Command Climate Administrator shall remain the primary handler for DEOCS communication and implementation) Conduct an OSIE at the Coast Guard Academy. Create an improved tracking system to ensure recommendations resulting from surveys and evaluations are implemented and observed for fidelity and effectiveness.
- **Recommendation 3:** Mitigate lower-level continuum of harm behaviors. Implement improved procedures for the mitigation of Continuum of Harm behaviors that do not rise to the definition of harassment, sexual harassment, or sexual assault. Develop professionally trained, active duty “Resilience Coordinators”, consisting of volunteer collateral duty personnel, to assist local service members with information and resources to include primary prevention, Operational Stress Control, sleep hygiene, stress management, physical fitness, nutrition, and other holistic wellness areas. These Resilience Coordinators can provide protective factor building information, activities, and opportunities designed to empower positive behaviors that mitigate risk of harmful behaviors.
- **Recommendation 4:** Enhance the Leadership Diversity Advisory Councils (LDAC) and mentorship programs by equipping these leaders with the knowledge and skillsets needed to assist in low to moderate risk situations. Identify vulnerable groups (e.g., age, rank, remote location, deployment, school, etc.) that may benefit from increased communication with and access to a Resiliency Coordinator, LDAC, Chaplain, and/or mentor. Install a “resource hub” for easy access and understanding of programs already in place to assist in the event there is an uncomfortable or inappropriate work environment.
- **Recommendation 5: Increase awareness of adverse childhood experience impacts.** Implement confidential screenings at specific accession points throughout service

⁸⁰DoD Instruction 6400.11, DoD Integrated Primary Prevention Policy for Prevention Workforce and Leaders,” (December 2022), Office of the Under Secretary of Defense for Personnel Readiness, https://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/640011p.PDF?ver=_-WRNG-g78mHPx4gQwkeaQ%3D%3D.

member's careers that would highlight the individual's vulnerabilities and associated resources available to assist. Use the research available to develop programs, trainings, and interventions to mitigate high risk/harmful behaviors in the work force that may be a result of ACEs (i.e., alcohol misuse, problems with anger management, poor coping skills, etc.). Standardize PHA questions to include a dialogue about ACEs and be prepared to offer associated resources.

ISSUE 2: Training does not support SAPRR awareness at proper times in a member's career.

- **Recommendation 6:** Strengthen the SAPRR education continuum and instruction to participants with progressive milestones and objectives corresponding to rank. Build a continuum of education with increasing responsibility relevant to rank (see *Appendix E* for the Army's example). Update and re-align command cadre training. Require subject matter experts deliver SAPRR training. Update annual eLearning training. Strengthen relationship with DoD SAPRO. Require bystander intervention training for all Coast Guard members.
- **Recommendation 7:** Require centralized collection and analysis of DEOMI and Gender Relations survey results. To measure the effectiveness of SAPRR training on making the Coast Guard a workplace intolerant of sexual harassment/assault, there needs to be centralized recording of survey responses and analysis of trends over time, which will allow future decisions on policy and training to be evidence-based. (Note: An IPP program could conduct this task).
- **Recommendation 8:** Each SAPRR training objective requires an effectiveness measurement plan. If training is disseminated to empower Coast Guard members to intervene as bystanders in a potentially dangerous situation (bystander intervention training), then collection of data needs to be in place to record if they intervened and if not, why. In addition, the number of reported cases needs to be tracked by location and time to determine if the workforce is more empowered to report (higher rate of reporting than before the training). Ensure appropriate resources, staffing, and funding are available to accomplish training objectives and effectiveness measures.

ACCOUNTABILITY

Examine existing law and policy to determine if the Coast Guard has adequate ability to hold perpetrators accountable. Review selected case history to identify if this ability has been implemented adequately. Include a review of the Academy cadet disciplinary process.

1. The Coast Guard promulgated a new instruction on harassing behaviors, including harassment, sexual harassment, hazing and bullying, and retaliation or reprisal that mandates findings be documented and, for sexual harassment, results in initiation of processing for separation.
2. The new policies contain broad definitions. However, the dividing line between poor workplace climate and harassing behavior is not clear based on the definitions.
3. The Coast Guard has implemented significant changes to military justice.
4. The most recent changes, establishing Office of the Chief Prosecutor (OCP) and Special Trial Counsel (STC) transfer authority over covered offenses, including rape and sexual assault, from convening authorities to special trial counsel.
5. Coast Guard military justice cases are increasingly complex, especially about electronic information.

The Coast Guard has made significant policy changes across the spectrum of harassing behaviors (i.e., harassment, sexual harassment, hazing and bullying, and retaliation or reprisal) and has implemented significant military justice changes establishing an Office of Chief Prosecutor and Special Trial Counsel in accordance with changes in the Uniform Code of Military Justice.

Harassing Behaviors

In February 2023, the Coast Guard published an updated *Commandant Instruction on Harassing Behavior Prevention, Response, and Accountability*. This policy contains key features intended to address bad behaviors across the continuum of harm. The policy contains broad definitions of harassment, sexual harassment, hazing and bullying, and retaliation or reprisal. Anyone who receives a complaint is required to promptly (generally within one calendar day) report the incident through the chain of command or to the first immediate convening authority. Convening authorities should consult with their servicing legal office to determine if an allegation constitutes harassing behavior.

If the complaint does not allege facts that, if true, would constitute harassing behavior, the complainant should be given the opportunity to revise the complaint. If the complaint does not allege facts rising to the level of harassment the policy directs that Commanding Officers, Officers in Charge, and supervisors “must also address and stop conduct not rising to the level of harassing behavior, but that is nonetheless unacceptable in a work environment, even if a single unintentional incident, and take appropriate action with respect to the offender.”⁸¹ This

⁸¹ “Commandant Instruction 5350.6, Subj: Harassing Behavior Prevention, Response, and Accountability,” (February 2023), U.S. Coast Guard, 5.

requirement is contained within the general section on what constitutes bad behaviors, not in the section about reporting harassing behaviors which contains the guidance on evaluating complaints. It may not be clear what leaders should do with complaints that do not constitute harassing behavior.

If the complaint does allege harassing behavior, the policy requires the first convening authority to take action to include ensuring the safety of the aggrieved party, taking appropriate measures to stop the harassing behavior (e.g., issuing a cease-and-desist order, separating harasser from the aggrieved person), and promptly initiating an investigation (usually within seven calendar days, but no more than 10 calendar days of receipt). Convening Authorities in receipt of reports of sexual harassment, sexual assault, workplace violence, hazing, threatening behavior, child abuse, spousal abuse, stalking, or wrongful broadcast of intimate visual images must notify CGIS of the allegations.

When the convening authority receives the report of investigation, the policy directs that the convening authority take final action (at a minimum concluding whether the alleged conduct occurred and if prohibited under the policy) and document the findings in a Final Action Memo (FAM). The FAM must include, among other things: a determination whether the allegation is substantiated or unsubstantiated, any remedial or corrective actions taken or planned, specific nature of substantiated harassing behavior and any aggravating factors (e.g., harassment based on a protected status), and include a finding addressing whether anyone in the chain of command or supervision knew or should have known of the alleged harassing behavior prior to the report and whether the chain of command or supervision failed to properly address the behavior or follow the procedures in the policy.

If there is a finding that a military or civilian supervisor in the chain of command or supervision knew or reasonably should have known of the harassing behavior, and failed to immediately and appropriately address it, they will at a minimum include documentation in the military supervisor's record or for civilian's action in accordance with the Commandant Instruction on Civilian Personnel Actions. If there is a finding that a military or civilian supervisor in the chain of command or supervision failed to follow the procedures in the Instruction, documentation of the finding may be appropriate in circumstances involving a knowing failure to follow procedures. Corrective action does not preclude further disciplinary action.

For military members, findings of harassment must – at a minimum – be documented in a Form CG-3307. An enlisted member who has a documented, substantiated instance of sexual harassment will be processed for involuntary separation and is ineligible for reenlistment. A single substantiated instance of harassment by an enlisted member provides the basis for involuntary administrative separation unless the convening authority concludes that a first incident was isolated or unintentional, and the individual through their efforts at rehabilitation has clearly demonstrated that they will not engage in harassing behavior in the future. Any subsequent incidence of documented substantiated harassment will result in processing for involuntary administrative separation. A single documented substantiated incident of harassing behavior (that is not sexual harassment) does not make a member ineligible for reenlistment, but

Commanding Officers and Officers in Charge shall not recommend, and PSC will not approve reenlistment or extension of service unless the incident was isolated or unintentional, and the individual through their efforts at rehabilitation has clearly demonstrated that they will not engage in harassing behavior in the future. PSC will not approve reenlistment or extension of service if the member has more than one documented, substantiated instance of harassing behavior and one instance is in the current period of enlistment.

Commands must notify PSC for any officer with a documented, substantiated instance of sexual harassment or harassment. PSC shall initiate separation processing for any substantiated incident of sexual harassment. PSC shall also initiate separation processing for any substantiated incident of any other harassing behavior unless the incident was isolated or unintentional, and the individual through their efforts at rehabilitation has clearly demonstrated that they will not engage in harassing behavior in the future. A second documented, substantiated incident of harassment shall result in processing for separation.

The definitions of harassing behaviors (harassment, sexual harassment, and hazing, and bullying) are broad. However, the distinction between improper conduct and harassing behavior is not clear. The Coast Guard should reinforce the requirement for command communications with legal advisors to ascertain whether the facts as alleged, if true, constitute harassment. Consistent with the concept of promptly resolving issues, the Coast Guard should further emphasize the requirement that leaders and supervisors must take action to address improper conduct even if it does not meet the definitions of harassing behaviors.

Military Justice

There have been numerous legislative changes involving the prevention of and response to sexual assault in DoD and the Coast Guard. The 2020 NDAA required GAO review of Armed Forces' implementation of statutory requirements between 2004-2019. GAO conducted a review of DoD and Coast Guard implementation of 249 statutory requirements over that time.⁸² The 2022 NDAA contained sweeping changes to the Military Justice System. Included in those changes are the establishment of special trial counsel.⁸³ Special Trial Counsel (STC) are specially trained prosecutors who will exercise exclusive disposition authority over 11 statutorily defined covered offenses (occurring after December 27, 2023) UCMJ Articles:

- 117a (Wrongful Broadcast or Distribution of Intimate Visual Images);
- 118 (Murder);
- 119 (Manslaughter);
- 119a (Death or Injury of an Unborn Child);
- 120 (Rape and Sexual Assault);

⁸² "DoD and Coast Guard Should Ensure Laws Are Implemented to Improve Oversight of Key Prevention and Response Efforts," (March 2022), U.S. Government Accountability Office, GAO-22-103973, <https://www.gao.gov/products/gao-22-103973>.

⁸³ "S.1605, National Defense Authorization Act for Fiscal Year 2022," (117th Congress, December 2021), <https://www.congress.gov/bill/117th-congress/senate-bill/1605/text>.

- 120a (Depositing Obscene Materials in the Mails);
- 120b (Rape and Sexual Assault of a Child);
- 120c (Other Sexual Misconduct);
- 125 (Kidnapping);
- 128b (Domestic Violence);
- 130 (Stalking);
- 132 (Retaliation);
- 134 (Child Pornography); and
- 134 (Sexual Harassment).

The special trial counsel may exercise authority over any offense related to the covered offense or known offense committed by the accused. Special trial counsel has “exclusive authority” to determine if “a reported offense is a covered offense.”⁸⁴ Once they make the determination that a reported offense is a covered offense, the authority over the covered offense, as well as any related or known offense the special trial counsel elects to exercise authority over, it is the special trial counsel (not the convening authority) that has authority with respect to those offenses to: withdraw or dismiss the charges and specifications; refer the charges and specifications to trial; enter into plea agreements; and determine if an authorized rehearing is impracticable.

The Coast Guard exercised this authority through the establishment of the OCP led by a Coast Guard Rear Admiral (O-7) with a staff of specialized trial counsel, other prosecutors, and appellate litigators to represent the United States in UCMJ litigation of covered as well as non-covered offenses. The Coast Guard’s Special Trial Counsel Report to Congress provides an implementation plan and additional details regarding the implementation of UCMJ Article 24a.⁸⁵ The OCP is actively reaching out to convening authorities and their staff judge advocates to review authorities and discuss processes for special trial counsel exercising authority over cases and in instances where cases are not referred to trial, deferral of cases back to commands for action as appropriate. Ensuring a consistent understanding of processes will be critical to the exercise of authority by the OCP. Similarly, for matters the OCP defers, commands and convening authorities will need to understand the extent and limitations on their options in taking UCMJ and administrative actions.

When establishing the OCP, the Coast Guard considered the staffing needs to fully build out a centralized prosecution function for all Coast Guard UCMJ litigation. The Special Trial Counsel Report to Congress notes that support in other offices will be finalized as the OCP nears full operational capacity.⁸⁶ As part of that review, the Coast Guard should assess resources for the defense, special victims’ counsel, and judiciary as well as CGIS investigators to ensure a

⁸⁴ Ibid.

⁸⁵ “Sexual Assaults: Expedited Transfer and Special Victim’s Counsel Program: Fiscal Year 2021 Report to Congress,” (June 2021), U.S. Coast Guard, https://www.dhs.gov/sites/default/files/publications/uscg_-_sexual_assaults_-_expedited_transfer_special_victims_counsel_program.pdf.

⁸⁶ Ibid.

balanced investment across all aspects of the military justice system. With the growth of legal billets, the Coast Guard should consider necessary support billets as well.

The professionalization and specialization of military justice practitioners in the Coast Guard is a positive advancement. However, the Coast Guard does not have a Judge Advocate General (JAG) Corps so Coast Guard Judge Advocates must compete for promotion with all Coast Guard officers. Officers with such a narrow focus within a specialty may be at risk for promotion. The Coast Guard should consider policy and legislative options to attract Judge Advocates to military justice positions (e.g., assignment and incentive pay, temporary promotion, direct commission hiring, etc.) and ensure a viable career path for those officers who will need the specialized skills and judgment to handle the most complex military justice cases.

Prior to the FY22 NDAA changes providing the special trial counsel with authority over covered cases, the convening authority was responsible for referring cases and funding courts-martial which involved budgetary tradeoffs. Further, we have uniformly heard from prosecution, defense, and CGIS that the complexity of cases especially with respect to electronic information has increased significantly. In addition, the need for expert testimony for both the government and defense has increased. Thus, the cost of courts-martial are increasing. With the establishment of the OCP and the centralization of all prosecution functions, the Coast Guard should consider centralized funding of courts-martial.

Because of the increased complexity of cases and significant increase in electronic information, the Coast Guard should invest in CGIS resources for the collection and analysis of electronic evidence. CGIS currently reports through the Deputy Commandant for Operations. The Coast Guard should evaluate the reporting chain for CGIS.

Sexual assault offenses are crimes of violence. The Coast Guard should consider including sexual assault as an insider threat and providing necessary resources to evaluate the threat across Coast Guard .mil and Coast Guard Academy .edu networks.

CGA Cadet Disciplinary Process/Cadet Regulations

As a foundational matter, the mishandling of sexual assault and rape cases reviewed in Operation Fouled Anchor investigations is unlikely to be repeated. This is due to the unambiguous requirement that CGIS investigate sexual assault and rape cases and the transferring of authority over covered offenses to special trial counsel. These structural changes will prevent the egregious mishandling reflected in the Operation Fouled Anchor Final Action Memo.

The Academy is currently undertaking a comprehensive overhaul of the cadet regulations and the cadet discipline system.

The cadet disciplinary system and cadet regulations were last updated in 2022. The 2022 update established the Cadet Conduct and Discipline System, SUPTINST M5215.3A, as a separate

manual from the Regulations of the Corps of Cadets. As described in the Discussion and Background of the Superintendent Instruction, “[t]he Cadet Conduct and Discipline System is published to prescribe policies and establish administrative processes to address cadet misconducts, to include a list of offenses, Cadet Hearing procedures, restriction, marching tours, as well as outline the honor concept and define lying, cheating, and additional terms related to the Conduct and Discipline System.” The major changes included both administrative and process changes. “Administrative changes include selection criteria for the Cadet Honor Board (CHB), added requirements for CHB case reviews, a clarified plagiarism definition, clarified hearing authorities, and a punishment table. Process changes include awarding of a Class I without a hearing, updated conduct deficiency requirements, an addition of formalized Chiefs Counsel as a tool to corrected misconducts, definition and outline of a suitability for service hearing, and updated rules for marching tours.” In addition to removing the portions of the regulations that have been updated as the Cadet Conduct and Disciplinary System, the changes to the Regulations for the Corps of Cadets included a complete reorganization to consolidate all regulations into one chapter, “[u]pdates to Professional Competency Standards, addition of Leave without Pay for pregnancy, updated vehicle policy and updating of language to match current environment (i.e., removal of pronouns). Additionally, there were changes made to cadet daily routine and changing last military obligation (LMO) to time liberty granted (TLG) to better align with fleet practices.”

The Academy is currently undertaking a comprehensive review of the cadet regulations and the cadet discipline system to provide clarity and predictability for matters to be addressed under the cadet disciplinary system and those handled under the Uniform Code of Military Justice, improve accountability and transparency, and better promote good order and discipline at the Coast Guard Academy. Cadet Division is leading a workgroup, with representation across the campus, conducting an in-depth review to provide recommendations to CGA leadership. The primary goal is to create a system that provides cadets with leadership tools and the opportunities to use them.

Recommendations

ISSUE 1: The definitions of harassing behaviors (harassment, sexual harassment, hazing and bullying) are broad. However, the distinction between improper conduct and harassing behavior is not clear.

- **Recommendation 1:** The Coast Guard should reinforce the requirement for prompt command communications with legal advisors to ascertain whether the facts as alleged, if true, constitute harassment. Consistent with the concept of promptly resolving issues, the Coast Guard should further emphasize the requirement that leaders and supervisors must take action to address improper conduct even if it does not meet the definition of harassing behaviors.

ISSUE 2: Coast Guard members at greatest risk of experiencing improper conduct and poor workplace climate are generally younger, more junior, are often new to a unit, and they generally lack support networks.

- **Recommendation 2:** The Coast Guard should develop an avenue for members to seek support at their unit as well as an opportunity to raise questions and receive guidance from a trained individual separate from their current unit.

ISSUE 3: Sweeping changes to military justice are currently being implemented, so we do not have the ability to analyze them.

- **Recommendation 3:** Close communications between OCP/STC and commanders/convening authorities/their Staff Judge Advocates will be key on the STC exercise of authority over covered cases and deferral of cases back to commanders/convening authorities.

ISSUE 4: When establishing the OCP, the Coast Guard considered the staffing needs to fully build out a centralized prosecution function for all Coast Guard UCMJ litigation.

- **Recommendation 4:** The Coast Guard should conduct a review of resources for the defense, special victims counsel, and judiciary to ensure a balanced investment across all aspects of the military justice system.

ISSUE 5: The professionalization and specialization of military justice practitioners in the Coast Guard is a positive advancement. The Coast Guard does not have a JAG Corps and Coast Guard Judge Advocates compete for promotion must compete with all Coast Guard officers. Officers with such a narrow focus within a specialty may be at risk for promotion.

- **Recommendation 5:** The Coast Guard should consider policy and legislative options to ensure a viable career path for those officers who will need the specialized skills and judgment to handle the most complex military justice cases.

ISSUE 6: The ATR team has uniformly heard from prosecution, defense, and CGIS that the complexity of cases especially with respect to electronic information has increased significantly.

- **Recommendation 6:** With the establishment of the OCP and the centralization of all prosecution functions, the Coast Guard should consider centralized funding of courts-martial. Because of the increased complexity of cases and significant increase in electronic information, the Coast Guard should invest in CGIS resources for the collection of analysis of electronic evidence.

TRANSPARENCY

Assess barriers to transparency, to include a review of existing sexual assault and sexual harassment reporting requirements to Congress and communications to our total workforce, including best practices and lessons learned.

The team perceived the intent of the line of effort as a desire to increase transparency and promote efforts to do so. To answer the specific tasking in the line of effort, the team reviewed transparency through three lenses.

The first is transparency at the unit level at the time an incident is reported and through the subsequent investigations and administrative or judicial proceedings. The second is transparency back through the Coast Guard at the culmination of an administrative or judicial proceeding (e.g., Good Order and Discipline). The third is transparency to Congress and the public.

Release of Coast Guard information includes an evaluation of certain types of information (e.g., privacy, medical, privileged information and communications) that requires protection from disclosure. Because of the complex and sometimes competing interests with respect to public disclosure of information, the Coast Guard should include facilitated discussions incorporating case studies in Leadership Development Courses for senior Officer and Enlisted courses in the leadership continuum, during command cadre training, and at Commanding Officer conferences.

Transparency at the Unit Level

Reports of sexual harassment and sexual assault involve significant privacy and potentially medical privacy protections for victims and those accused. However, in the absence of information speculation, rumors spread which is further compounded by social media. Anecdotally, victims report being labeled and that their corresponding “reputation” often precedes or follows them when reporting to new commands.

Information sharing during the investigation stage is limited by concerns for personal privacy, to protect the techniques and procedures of the investigation, and to prevent interference with enforcement proceedings. It is important that commands and supervisors have tools and resources immediately available to assist in publicly addressing matters when they arise and limiting the ability for rumors and false narratives to spread. Anecdotally, Commands and supervisors are often uncertain about what is permissible to say. Commands should have no hesitation reaching out to legal advisors for advice and guidance. Comprehensive and timely guidance is critical.

In addition to concerns about interfering with an ongoing investigation and Unlawful Command Influence, there are potential civil remedies and criminal penalties associated with a Privacy Act violation. Therefore, with an eye toward sharing information to the maximum extent possible, Coast Guard Judge Advocate General should determine the type of resource and guidance for a toolkit providing guidance on release of information and investigatory,

administrative, or judicial processes to assist commands in discussing matters among the command following the report of an incident.

Transparency of Administrative and Judicial Actions

The Coast Guard regularly publishes and makes publicly available a summary of disciplinary and administrative actions taken when Coast Guard military members or civilian employees fail to uphold the high ethical, moral, and professional standards we share as members of the Coast Guard.⁸⁷ Actions from both the military and civilian systems are included to inform the entire Coast Guard community of administrative and criminal enforcement actions. The matters published include brief descriptions of offenses committed and punishments awarded at Coast Guard general, special, and summary courts-martial and selected military and civilian disciplinary actions taken Service wide.

The Coast Guard is taking action to provide further context (in keeping with victim privacy and the sensitivity associated with sexual misconduct) to both inform the Coast Guard community and provide commands with a tool to discuss accountability, prevention, and reinforce core values.

Transparency to Congress and the Public

Coast Guard provides transparency to Congress and the Public through reports to Congress as well as making the Good Order and Discipline Data publicly available.⁸⁸ The ATR reviewed the Coast Guard Congressional Reporting requirements and compliance. As detailed below, the Coast Guard complies with the delivery of required reports although delivery is often late.

Coast Guard Academy Sexual Harassment & Violence

- Annual Report
- APY 2017-2018, 2018-2019, and 2019-2020 reports delivered.
- APY 2021-2022 report is pending.
- No report was filed 2020-2021 due to COVID.

Coast Guard Academy Assessment of Cultural Competence⁸⁹

- National Academy of Public Administration (NAPA) in their Assessment of Cultural Competence at the CGA.
- Coast Guard Drafted: Final Action Memorandum: CGA Assessment of Cultural Competence delivered November 2022

⁸⁸ "GOAD Report," U.S. Coast Guard, https://www.uscg.mil/Resources/legal/GOAD_report/.

⁸⁹ "Coast Guard Academy Assessment of Cultural Competence," (February 2022), <https://napawash.org/academy-studies/u-s-coast-guard-academy-cultural-competence-assessment>.

- Coast Guard Drafted: Implementation Plan: CGA Assessment of Cultural Competence is pending.

Coast Guard Academy Diversity

- Annual report
- CGA Diversity CY 2020 data and CY 2021 data delivered to Congress.
- CGA Diversity CY 2022 data is pending.

Merchant Seamen Sexual Assault & Sexual Harassment Definitions

- One-Time Report.
- Due to Congress December 2023.

Sexual Assault Forensic Examinations

- Annual Report.
- Initial Submission (FY 2023 data) due to Congress March 2024.

Sexual Assaults in the Coast Guard

- Annual Report.
- FY 2019, 2020, and 2021 reports delivered.
- FY 2022 is pending.

Other Required Reports

- March 2023: Special Trial Counsel. Delivered.
- June 2021: Sexual Assaults: Expedited Transfer and Special Victim Counsel Programs. Delivered.
- March 2019: Sexual Assaults: Expedited Transfer & Special Victims' Counsel Program. Delivered

TRANSPARENCY TO CONGRESS AND THE PUBLIC

REPORT	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
CGA Sexual Harassment & Violence	Delivered	Delivered	Delivered	Delivered	Delivered	Pending	Annual Report					
CGA Assessment of Cultural Competence	Based on National Academy of Public Administration in their Assessment of Cultural Competence at the CGA .					Delivered	Implementation Plan: Drafted, Pending					
CGA Diversity				Delivered	Delivered	Pending	Annual Report					
Merchant Seaman Sexual Assault & Harassment Definitions							Due DEC 2023	One -Time Report				
Sexual Assault Forensic Examinations	Initial Submission (FY 2023 Data)							Due MAR 2024	Annual Report			
Sexual Assaults in the CG			Delivered	Delivered	Delivered	Pending	Annual Report					
Other Required Reports	Sexual Assaults, Expedited Transfer & Special Victims Counsel Program	Delivered			Delivered	Special Trial Counsel	Delivered					

Figure 5.1

The Coast Guard Academy Board of Visitors (BOV) is established under 14 U.S.C. § 1903 and is comprised of Congressional and Presidentially appointed members. The Board of Visitors has a broad scope to review: “(1) the state of morale and discipline; (2) recruitment and retention, including diversity, inclusion, and issues regarding women specifically; (3) the curriculum; (4) instruction; (5) physical equipment; (6) fiscal affairs; and (7) other matters relating to the Academy that the Board determines appropriate.” See 14 U.S.C. § 1903(d). The statute contains a requirement to submit a report following an annual visit to review the operations of the Academy and make recommendations. For a variety of reasons, including vacancies on the Board, the BOV has not visited CGA in several years and, as a result, there has been no report produced.

In addition to the Board of Visitors, the Coast Guard Academy provides executive level governance and oversight through a Board of Trustees.⁹⁰ The Board of Trustees is chaired by the Deputy Commandant for Mission Support, Deputy for Personnel Readiness (DCMS-DPR), a Coast Guard SES. The board has 12 voting members (7 flag officers, 4 SES including: 3 Coast Guard and 1 Department of Homeland Security [DHS], and 1 MCPO); 6 non-voting members (CGA Superintendent, 2 retired flag officers, 1 auxiliary member, 1 public sector executive, CGA Alumni Association Board Chair); and ex officio members representing all CGA divisions.

The Board of Visitors was established to provide oversight, advise leadership, and promote transparency. However, the Coast Guard Academy Board of Visitors is not currently

⁹⁰U.S. Coast Guard Academy BOV is available at: [Governance - United States Coast Guard Academy \(uscga.edu\)](https://www.uscga.edu/governance)

providing the oversight, advisory functions, and transparency envisioned by 14 U.S.C. § 1903. The Coast Guard should consider legislative and policy options to better carry out Coast Guard Academy governance through the Board of Visitors and Board of Trustees.

Related to governance, the Superintendent of the Coast Guard Academy is a Rear Admiral that reports to Deputy Commandant for Mission Support, Deputy for Personnel Readiness. As part of Coast Guard Academy governance and oversight, the Coast Guard should review the reporting chain for the Superintendent of the Coast Guard Academy.

Recommendations

ISSUE 1. Commands are often uncertain about what information can be provided at the time of an incident. In the vacuum of information, rumors spread which is further exacerbated by social media.

- **Recommendation 1:** In addition to concerns about interfering with an ongoing investigation, there are potential civil remedies and criminal penalties associated with a Privacy Act violation. Therefore, with an eye toward sharing information to the maximum extent possible, the Coast Guard should determine the type of resource and guidance for a toolkit best suited to assist commands in discussing matters among the command following the report of an incident.

ISSUE 2: To provide context to what behavior is unacceptable and the consequences of such behavior, transparency back through the Coast Guard at the culmination of an administrative or judicial proceeding (e.g., Good Order and Discipline).

- **Recommendation 2:** Provide greater context in Good Order And Discipline (GOAD) so that commands can use the GOAD information as a basis for discussion about proper behavior and climate.

ISSUE 3: The Coast Guard Academy Board of Visitors was established provide oversight, advise leadership, and provide transparency.

- **Recommendation 3:** The Coast Guard Academy Board of Visitors is not currently providing the oversight, advisory functions, and transparency envisioned by 14 U.S.C. § 1903. The Coast Guard should consider legislative and policy options to better carry out Coast Guard Academy governance through the Board of Visitors and Board of Trustees.

VICTIM SUPPORT

Examine the effectiveness of our victim support and recovery services, with particular attention to challenges at remote, rural, small, or deployed units.

1. The Coast Guard has made substantial improvements in the processes for sexual assault “response”, but the Service must devote more attention to and resources to “recovery” in the SAPRR program.
2. While preventing and responding to sexual assault is crucial, the Coast Guard cannot overlook the care and individual recovery process for victims, particularly in the long term.
3. Recovery from sexual assault is not a linear process, and the military system can make recovery even more difficult.
4. The current system puts the burden on the victim to navigate the recovery process.
5. Victims need adequate options and services to allow agency in decision making to reach recovery, in or out of the Service.

The Coast Guard has done a better job over the years responding to sexual assault, but it also has an obligation for the care and individual recovery process for victims, particularly in the long term. The Coast Guard has made substantial improvements in the processes for sexual assault “response.” The Service must devote more attention and resources to “recovery” in the SAPRR program.

Recovery from sexual assault is not a linear process. Shortly after an assault, victims often need to be seen by trauma-informed and empathetic providers. In the long term, victims experience a dynamic recovery. Negative reactions, by friends, family, mental health professionals, or their command, whether intentional or unintentional, can cause someone to withdraw. Triggers can come back causing someone to need help again. Case mishandling can lead to “secondary victimization.” The research on the effect of sexual assault on military members demonstrates that it can take years or a lifetime to work through the physical, mental, and emotional trauma.

The current system places the burden of the victim to navigate the recovery process. This includes handling both the personal and professional ramifications. The Coast Guard needs to shift the burden away from victims by offering empathetic support to victims’ recovery from trauma. The Service can accomplish this by providing victims adequate options and services to allow agency in decision making to reach recovery, whether they choose to stay in or opt out of the Service.

The research on the effect of sexual assault on military members demonstrates that it can take years or a lifetime to work through the physical, mental, and emotional trauma.

An additional point of examination is the current structure and organization of the Coast Guard's SAPRR program. DoD Sexual Assault Prevention and Response (SAPR) components have a plan of action, set for completion in 2027, that meets best practice recommendations for the field by professionalizing the workforce and standardizing training for SAPR personnel. The DoD SAPR Office (SAPRO) will offer training and support (at no cost) to the Coast Guard's SAPRR workforce if it is aligned with their organizational structure and mission.

A final consideration for victim support is consistent, timely availability of advocacy and mental/behavioral health resources. Gapped billets for victim advocates and mental/behavioral health providers are common, contributing to wait times for care, virtual availability of services only (primarily in remote locations), and potential for burnout within the current workforce.

Lack of Information After Reports

While there has been research since the 1990s on gender relations, sexual assault, and sexual harassment in the Coast Guard and at the Coast Guard Academy, these studies don't discuss the aftereffects when incidents do occur. Due to a lack of research or data on victims' experiences after a report and throughout their military service, it can be difficult to evaluate the effectiveness of the different victim support resources in the Coast Guard and to what extent the experience after an assault affects their career or service retention.

Through conversations with many victims over the course of the review, they indicated that, by using recovery tools to include expedited transfers, convalescent leave, and mental health resources, use of these tools altered their career trajectory or outright harmed their career. There are limited tools in place to protect sexual assault victims from unintended or retaliatory after-effects of their report, such as poor marks or delayed promotions, putting the burden on the victim to prove an injustice through either the Personnel Records Review Board (PRRB) or Board for the Correction of Military Record (BCMR), both cumbersome processes.

According to applicable DoD studies, between 2015-2021, the separation rates of service members were 12%, but for those who made unrestricted or formal reports of unwanted sexual behavior the separation rates were much higher: ranging from a 37% separation rate in the Air Force to a 60 %separation rate in the Marine Corps. While the Coast Guard does not track the separation rates of those who make reports, the RAND Women's Retention Study cited sexual assault and harassment as reasons why women separate from the Service, and the workforce gender relations studies support that members who experience unwanted sexual contact or sexual harassment are more likely to separate than their peers.

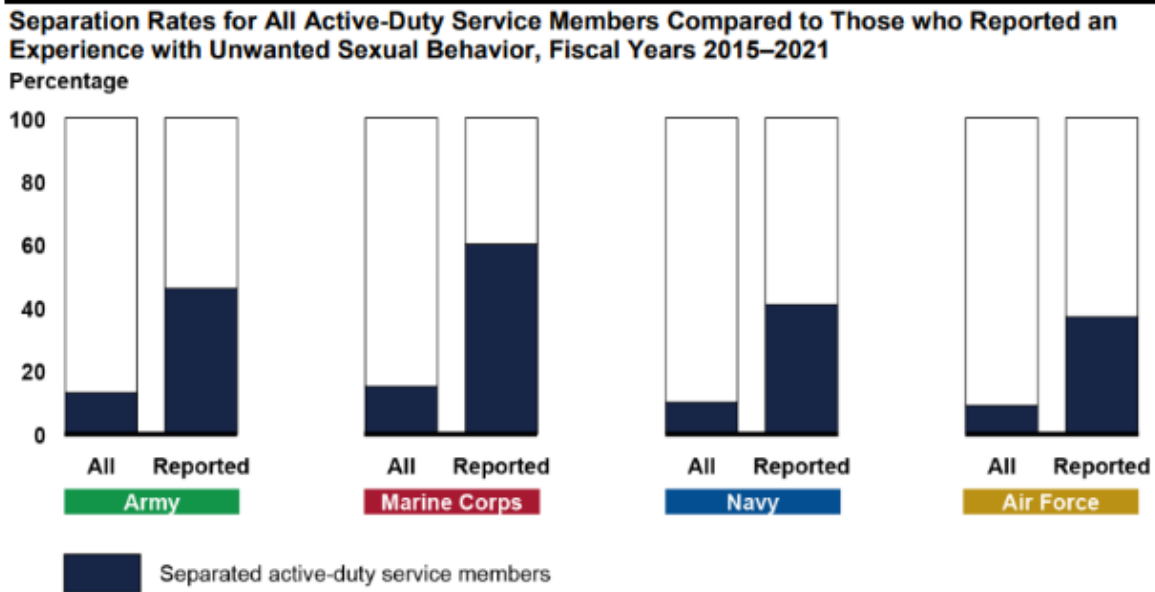


Figure 6.1: Chart Credit: GAO analysis of Department of Defense data, GAO-23-105381

None of these studies provide data or specific cases that delve into the extent that the sexual assault itself or the experience in the aftermath led to an impact to a member’s career or their separation from the Service. There is also a lack of information on what support services victims use and efficacy of each. To evaluate victim support services and their recovery, receiving feedback from victims while still in the Service or when separating is crucial.

To capture the effectiveness of current recovery programs and the experiences of victims, there needs to be an independent study initially to investigate both the efficacy of the SAPRR resources and include documented career or personal shortfalls victims faced after an assault.

Going forward, to continue to encapsulate these experiences and account for updated resources, the Coast Guard should implement a longitudinal survey within the SAPRR program.⁹¹ For example, the Special Victims’ Counsel Program, at the conclusion of an attorney-client relationship, gives victims an optional opportunity for anonymous feedback on their attorney and the SVC program at large. This optional tracked feedback should include evaluation of SAPRR resources such as SARCs, VAs, and medical. There also should be a mechanism, via optional survey, that is administered at specific times in a member’s career so they can provide feedback on the impacts of a report throughout their career. Having a more robust information feedback loop on the array of experiences can assist in understanding the pros and cons of

⁹¹ Implementation requires contracting for an independent, third-party review. The other option would be having Coast Guard members dedicated, for an extensive period with a more dedicated task, to a review to discuss experiences with victims and to evaluate the resources. For future SAPRR program review, working with TMX as a current resource, identify a way to create a longitudinal survey to evaluate the program’s resources and continue optional feedback throughout a career. PSC investigates the career impact potentials of using resources on boards, panels, advancement.

resources, suggest additional options, and help highlight the potential barriers to retention after their reports.

While these studies will be useful for long-term improvement of SAPRR resources and command response, there needs to be immediate review by the Personnel Service Center to identify the potential career impacts of using SAPRR resources and how to allow for recovery while also maintaining a successful career, if desired.

Behavior Healthcare Provider Shortages

Having access to appropriate mental health care is crucial for many victims' wellbeing. They are more likely to meet the criteria for Post Traumatic Stress Disorder (PTSD), depression, anxiety, and substance use disorders compared with those who do not report experiencing military sexual trauma. Provider shortages and limited trauma-informed providers are both barriers to accessing behavioral health care for victims.

Currently, the Coast Guard refers most patients seeking mental health care to the private sector as the Service employs only 12 military behavioral health specialists (psychiatrists and psychologists) and 5 contracted counselors. Throughout the Service, there is often one behavioral health provider serving a large population to include training centers, bases, sectors, and smaller units over a large geographic area. This limited number of uniformed and General Schedule (GS) providers face competing demands for timeline required appointments such as fitness for duty screenings, prescription follow-ups, and medical boards. Coast Guard members wanting to receive behavioral health services can at times wait weeks or months for appointments unless they are in acute distress.

In September 2023, the Coast Guard followed DoD to include "Sexual Assault First Contact-First Responder Training" as a training for Medical Officers and supporting healthcare personnel. Defense Health Agency officials said they were also updating requirements to mandate all behavioral health providers to take training specific to military sexual trauma patients. The Coast Guard has not established a requirement for their behavioral health providers to be specifically trained in trauma, or more specifically, military sexual trauma.

The Coast Guard needs to expand access to mental health services by hiring more behavioral health specialists and implementing a training program to ensure a certain percentage of those specialists are trained in sexual trauma and have military cultural competence. An increase in providers would not only benefit many other Coast Guard members, but it would also provide further resources to assist victims throughout their recovery process.

Ideally, specialists would be stationed near major shore commands with high concentrations of members, but they would still be able to see patients virtually as well to aid members in remote locations. For members who do not want any career limitations or disruptions, but wish to maintain continuous care, if a member desires, the Coast Guard should allow them to see the same military or GS behavioral health specialist, even virtually, after transferring to a new unit. By ensuring these are uniformed or GS positions, this would also alleviate limitations of providing services across states imposed by state licensing requirements, so these professionals do not necessarily need to be in one area to aid continuity of care options.

Challenges to Continuity of Care

Long term, consistent care is crucial to wellness for victims of sexual trauma. Military members historically struggle with continuity of medical care due to frequent permanent changes of station. With each transition, a member needs to go through what can be a months-long, and at times overwhelming, process to establish new care. For example, to receive a referral for behavioral health, a member must first see their primary care manager, and then receive their referral for psychiatry and/or therapy. Switching providers every 1-4 years means delay in care and results in victims needing to repeatedly tell their experiences to each new provider they see. Not only is retelling the story often triggering, but it can also take time to build a relationship with new mental health professionals. This segmented mental health care can be frustrating to navigate and for some, detrimental to their wellness.

The Coast Guard should develop a pathway that would allow affected members to be stationed in areas with accessible resources for care and appropriate jobs to continue their career. Enrollment would be optional, and a member can choose to disenroll from the program or work with medical and their command to seek limited exceptions to policy on case-by-case basis.

Enrollment would trigger a restriction in certain billet types, locations, and deployments to a detailee. It would provide victims the option to seek permanent change of station (PCS) orders to a major shore command within a reasonable commuting distance of a Veterans Affairs medical facility that offers specialized care for military sexual trauma victims. It would be accompanied by a non-clinical case manager to ensure the needs are being met through regular contact and assist the member in accessing resources available to them through civilian, military, and Veterans Affairs options.

This would help alleviate some of the burden on the victims to navigate the various and differing resource avenues, access mental healthcare, and improve continuity of care. It would provide an additional advocate after a matter has closed and SARC, Victim Advocate, or SVC are no longer assigned, to assist on communications with commands and PSC.⁹²

Burden on the Victim

Once a case is closed out, particularly if it does not meet the criteria for administrative or punitive action, there is no tracking mechanism in place to ensure that the involved individuals are not stationed together or end up in the same training. COMDTINST 1754.10F states “a victim with an Unrestricted Report (open or closed) may request an expedited transfer if stationed with a subject named in a law enforcement investigation of their sexual assault case.

⁹² Implementation would require standing up a new program – one modeled from a blend of the Special Needs Program, COMDINST M1754.7(series) and Coast Guard Human Immunodeficiency Virus Program, COMDTINST M6230.9(series). There would need to be best identified locations (e.g., Boston, St. Petersburg) where there are adequate resources (both mental health and SAPRR) and job options to transfer people to; “Commandant Instruction Manual 1754.7 Series, Subj: Special Needs Program,” (April 2020), U.S. Coast Guard; “Commandant Instruction Manual 6230.9 Series, Coast Guard Human Immunodeficiency Virus Program,” (September 2022), U.S. Coast Guard.

This may occur at any point in the victim’s career, with no time limit.”⁹³ This puts the onus on the victim to request an expedited transfer if they are stationed at the same unit as or in the same geographical area as their alleged assailant.

Rather than needing to request an expedited transfer if the victim is stationed at the same place as the accused, Personnel Service Center should put in place a mechanism for flagging that two people should not be stationed in the same location for a career after an Unrestricted Report. This would be something that a either party could opt into, and it would only be visible to assignment officers via a note to flag the no-colocation of two members.

For other temporary assignments, C-Schools and A-schools should post their class rosters to SharePoint so it can be easy for someone to check the members in their course. If one person is uncomfortable with someone on the roster due to past sexual assault or harassment, they can be aware before arriving at the course and explore alternate options to attend. ⁹⁴

No Expedited Transfer for CGA Cadets

Unlike the rest of the Coast Guard, CGA cadets do not have options for expedited transfers nor are there avenues to leave the Academy for recovery without delaying a commissioning timeline. This leaves victims who still wish to serve and commission living in the same building where the assault occurred, on the same campus as the alleged offender, and around many reminders and triggers of the assault which are all potential barriers to recovery.

The United States Military Academy, United States Naval Academy, and United States Air Force Academy have statutory authority to consider a request by a midshipman or cadet who is the victim of an alleged sexual assault to transfer to another military service academy or to enroll in a Senior Reserve Officers’ Training Corps program affiliated with another institution of higher education. The Coast Guard should consider policy and legislative options to allow CGA cadets who are victims of sexual assault to transfer to another military service academy, and if desired, accept an appointment to that service academy.

Because the Coast Guard does not have a Senior Reserve Officer Training Program consideration should be given to allow victims to transition to an approved civilian college to complete their degree with the opportunity to commission via established routes in the Coast Guard such as Officer Candidate School or the Direct Commission program. These options would allow a victim to shift to a new location and allow them to continue their path toward commissioning in the Armed Forces while also prioritizing recovery.

⁹³ “Commandant Instruction 1754.10F, Sexual Assault Prevention, Response, and Recovery (SAPRR) Program,” (April 2023), U.S. Coast Guard.

⁹⁴ *Implementation requires engagement with PSC on how to put the “no-location” flag in DA and what that radius would be. The flag needs to respects privacy by identifying the very limited personnel who can have eyes on it. FORCECOM can direct their schools to begin posting or emailing rosters.*

Post-Separation Feedback

This review highlighted that victims who served in the Coast Guard continue to struggle with the effects of their trauma. Many want their stories to be heard and to provide recommendations to ensure shortfalls in their experience do not happen again. For those who have left the Service, there are limited official outlets to discuss their experiences.

This program would provide a formalized process for victims who have separated to communicate back with the Service. By allowing victims to engage via a Coast Guard established program structured and facilitated by trained professionals, this could provide opportunities for victims to tell their story, speak to future and current leaders, affect culture change, and provide recommendations going forward. This formalized approach could help further initiatives of the SAPRR program through understanding the experiences and lessons learned from victims who have separated from the Service, a group that is generally not included in surveys and listening sessions.

Accession Standards

The Coast Guard Academy is a 200-week program, requiring cadets to meet stringent medical accession standards both on Week One and on Week 200. If a cadet has any medical concerns, whether physical or mental, and they receive a diagnosis that is not acceptable via accession standards, even if they technically meet retention standards, they are not able to commission and serve in the Coast Guard without an approved medical waiver, which can be inconsistently approved depending on the medical or leadership staff.

If the assault happened at the CGA and the member has a disqualifying diagnosis as a result, but still meets retention standards, they should receive a waiver for commissioning. If a cadet can perform the duties of an officer but may not be available for all jobs, there should be considerations made to waive their condition and allow them to still serve in the organization at locations that allow them to continue receiving care. With a formal exception in policy, sexual assault victims should be presumed to receive a waiver if they are able to meet retention standards. Thus, the burden is on the government to determine why the waiver should not be granted, instead of the victim needing to prove why they should be permitted to commission.

Recommendations

ISSUE 1: There is a lack of information and research on victims' experiences after reports.

- **Recommendation 1:** Implement both an independent and Service-run longitudinal study for victims to provide feedback on all SAPRR resources and their experience in the Coast Guard after a report. Engage with PSC to determine ways to create a process for using resources to minimize career impacts.

ISSUE 2: There is a shortage of accessible, trained behavioral healthcare providers for victims.

- **Recommendation 2:** Increase number of Behavioral Health Specialists both overall and number of those with military sexual trauma training, available virtually.

ISSUE 3: Victims struggle to maintain continuity of care and stability.

- **Recommendation 3:** Create a Special Needs Transfer Program for victims with Unrestricted Reports.

ISSUE 4: The burden is on the victim to keep track of the accused.

- **Recommendation 4:** Create a flagging system to provide a victim-centric assignment consideration so that members involved in a case may not be stationed together or going to the same locations for temporary duty throughout a career.

ISSUE 5: Academy cadets do not have expedited transfer options.

- **Recommendation 5:** Create mechanisms for inter-service academy transfers or allow victims to attend a civilian college and then OCS.

ISSUE 6: Victims have no mechanism for feedback, engagement after separating.

- **Recommendation 6:** Create a program for restorative engagements that will allow victims to work on healing with the assistance of trained personnel.

ISSUE 7: Victims at the CGA are required to still meet accession standards after an assault, causing barriers to reporting resulting mental health concerns.

- **Recommendation 7:** If an assault happened while in cadet status, and the victim meets retention standards, put policy in place so that they have to meet retention, not accession standards.

ISSUE 8: Current SAPRR organization/structure is not aligned with DoD, which reduces potential collaboration of resources and ignores best practice recommendations extrapolated from years of lessons learned from a myriad of federal agencies.

- **Recommendation 8:** Approve the SAPRR Oversight and Policy Office’s restructure plan of action and provide additional billets and funding accordingly (Appendix F). This establishes a supervisory chain where everyone is a credentialed advocate and subject matter expert (SME), lending itself to improved guidance, mentoring, and policy adherence. In addition, it opens the bandwidth of the SAPRR Oversight and Policy Office to review, revise, and provide SAPRR trainings (in accordance with FC-T’s finding for SMEs to facilitate SAPRR course) and be more involved in the oversight of how SAPRR personnel execute policies at the field level. Lastly, the structure will have parity with DoD SAPR allowing the Coast Guard access to the professionalized training and credentialing required by 2027.

ISSUE 9: Coast Guard leadership and the SAPRR workforce, full-time and volunteer, report a significant shortage of manpower available to cover large areas of responsibility and meet the Volunteer Victim Advocate (VVA) coverage requirements set forth in SAPRR Program, COMDTINST 1754.10F.

- **Recommendation 9:** Conduct a field study to ascertain appropriate number of SAPRR workforce resources for districts, sectors, training centers, and area units. Look at military, civilian, and contractor options to fill gaps and provide services to remote areas (i.e., a specific team established to travel and meet in-person with victims of sexual assault).

For additional SAPRR information and resources, please see QR code in *Appendix G*.

AWARENESS

Examine our total workforce's awareness and compliance with existing law and policies related to sexual assault, sexual harassment, and anti-harassment/potential hate incidents.

1. Coast Guard training related to sexual assault, sexual harassment, and anti-harassment/potential hate incidents provides awareness of existing policies and procedures rather than a focus on the tools and skills for prevention of the actual incidents.
2. Junior personnel are the most at-risk personnel and most likely offenders. There is a need to improve and increase outreach to junior personnel and focus protective measures on this population.
3. Increase frequency and quality of SAPRR-related engagements.
4. Provide servicemembers with ready access to training and educational information. Training and information need to be available at the right time for each member (before, during, and after an incident and targeted for general workforce, victims, and leadership).

Awareness of Existing Law and Policies

Examination of the total workforce's awareness of existing law and policies related to SASH, and AHHI involved a review of current training requirements and outreach activities. The review also included anecdotal information gathered from a variety of subject matter experts best placed to witness gaps in awareness within the workforce.

Each Coast Guard unit clearly displays the Commandant's policy statements, to include the Anti-discrimination and Anti-hate Policy, Diversity and Inclusion Policy Statement, and the Equal Opportunity Policy. Upon a Commandant's Change of Command, the incoming Commandant immediately releases updated policy that is promulgated and posted.

Accessions and Transitions

At Training Center Cape May, the Coast Guard has incorporated learning objectives related to SASH and AHHI into both accession sources for enlisted members, recruit training (RT), and the Direct Entry Petty Officer Training (DEPOT) course. Recruits also receive the RT Pocket Guide and Recruit Rules and Regulations that provide guidance and job aids for immediate reference. Additionally, the Coast Guard has incorporated command cadre sexual assault Terminal Performance Objectives (TPO) into the Recruiter School and Company Commander School curricula.

At the Coast Guard Academy, the Coast Guard has incorporated learning objectives related to SASH and AHHI into both the Military Training Program Curriculum and within the Academic Curriculum. Under the Military Training Program, these topics are included in the Swab Summer Training Program and in annual training. Fourth class cadets (freshmen) receive an additional training block during the school year. The Academic Curriculum comprises core

courses required for all cadets, specific courses required by each major, and elective courses. The core courses directly related to concepts associated with Core Values include: Organizational Behavior & Leadership, Principles of Military Justice, Moral and Ethical Philosophy, Cultural Perspectives, Global Challenges, and Health and Physical Education courses. *Principles of Military Justice* is a substantial, four-credit course that introduces cadets to policies, regulations, and the UCMJ. The course directly confronts cases of sexual assault, rape, AHHI and an officer's professional responsibilities in preventing and responding to these crimes. The Organizational Behavior and Leadership Course serves as the Academy's central component to deliver leadership knowledge under the Academy's L-E-A-D⁹⁵ strategy to operationalizes the mission to produce Leaders of Character. The course is structured around the Coast Guard's Leadership Development Framework.

The Bachelor of Science curriculum regularly evolves and includes courses dealing with inclusivity, ethics, personal and interpersonal wellness, cultural competence, and social equity. These courses provide insight into the impacts of social power structures, violence, hate, racism, and sexism and require students to deep dive into causes, consequences, and solutions. The courses lay the foundation for civil, ethical, professional behavior attitudes intended to strengthen positive interpersonal relationships and foster a community of mutual understanding. These elements of the curriculum build understanding of the Coast Guard core values and of organizational culture. Recognizing that curriculum development is a dynamic process, the Coast Guard Academy should consider how the Nautical Science IV Professional Maritime Officer course could include SAPRR related concepts. Further, the Coast Guard Academy is an intellectual resource for the Coast Guard. Investments in research funding could offer opportunities to further understanding of SAPRR related topics through scholarship.

Outside the Coast Guard Academy, the Coast Guard has incorporated learning objectives related to SASH and AHHI into all its officer accessions and transition courses. Except for the Direct Commissioned Officer (DCO) course, the SAPRR learning objective focuses on scenario-based problem-solving regarding a potential sexual assault (reporting/response). The DCO course has a learning objective with a supervisory scenario to establish a command climate to prevent sexual assault and sexual harassment.

General Mandated Training

The Coast Guard requires a variety of SASH and AHHI training courses within General Mandated Training (GMT). The relevant courses are: (1) *Preventing and Addressing Workplace Harassment*, (2) *Sexual Harassment Prevention*, (3) *Civil Rights Awareness*, and (4) *Sexual Assault Prevention, Response, and Recovery (SAPRR)*. Note: Prior to August 2023, the SAPRR component was included as part of the mandated *Workforce Resilience Training*. These trainings are conducted online and required annually, apart from Civil Rights Awareness which is required triennially and conducted exclusively via live instruction coordinated through the Civil Rights

⁹⁵ L-E-A-D stands for Learn from theory, Experience through practice, Analyze through reflection, Deepen understanding through mentoring.

service provider. Supervisors of civilians are also required to complete the *DHS No Fear Act and Anti-Harassment* course biennially.

GMT is required for all active duty, reservists on selected reserve status, government service, and wage grade civilian employees. In FY22, approximately 85% of the workforce completed the relevant GMT. Coast Guard Auxiliarists are required to complete Auxiliary Core Training (AUXCT) which includes Sexual Harassment Prevention, SAPRR, and Civil Rights Awareness. Auxiliarists must complete AUXCT every five years. For Auxiliarists, completion of AUXCT is necessary for the member to be actively engaged in the Auxiliary program.

There are no regulatory or policy requirements that Coast Guard contractors must complete training related to SASH and AHHI. Specifically, training is not required under the Homeland Security Acquisition Regulation (HSAR). The Coast Guard relies on contractors meeting legal requirements under the U.S. Equal Employment Opportunity Council. Anecdotally, some large Coast Guard contracting companies require annual training on these topics.

Enlisted Professional Military Education

Coast Guard enlisted members must complete EPME to become eligible for promotion. Generally, they are tested on their knowledge during a service-wide exam. Each year the Coast Guard may determine that, due to significant Coast Guard need, the service-wide exam requirement may be waived for certain specialties at specific grades. Under the current EPQ Standard, harassment and sexual assault awareness and prevention is required for members seeking promotion to E-2. However, there are no questions related to this EPQ in the current service-wide exam question bank. These EPQs will need to be shifted to the E-3 section as the Coast Guard intends to eliminate EPQs for promotion to E-2. The next reference to non-consensual sexual activity is a service-wide exam question for members seeking promotion to E-7. The EPQ reference is the Office of Work-Life Programs (CG-111) website. The Coast Guard last completed an Occupational Analysis, the first step in updating EPME, in 2014.

Leadership Courses

The Coast Guard has incorporated learning objectives related to SASH and AHHI as part of the Apprentice Leadership Program (ALP). The ALP is required prior to advancement to pay grade E-4. ALP is provided the first week of each Class “A” Course. The ALP course curriculum is not consistent across the different Class “A” Schools.

The Coast Guard has incorporated learning objectives related to SASH and AHHI into resident leadership courses for active duty and reservist enlisted members. Of note, there is not currently a relevant Terminal Performance Objective (TPO) included in the Leadership And Management School (LAMS) course. The LAMS course is a requirement for promotion to E-6. There are several instructional blocks dedicated to these matters in the Chief Petty Officer

Academy (CPOA) for E-7 selects. Less than half (47%) of current E-7s have completed CPOA. Course completion is a requirement for promotion to E-8. The subject matter is also included in the Senior Enlisted Leadership Course (SELC) for E8s and E-9s.

Learning objectives related to SASH and AHHI have been integrated into optional resident leadership courses for active duty, reserve, and civilian members for grades O-3 through O-5 and GS12 – 14.

Command and Operations Courses

The Coast Guard has incorporated learning objectives related to SASH and AHHI into all command and operations courses required for military members prior to starting Commanding Officer, Executive Officer, and Boat Forces Command assignments. The current relevant TPO for these courses is to implement a course of action to prevent sexual assault and harassment.

Program Facilitated Training

The SARC conducts informal outreach from local field offices to new commands within their area of responsibility (AOR). They discuss the SAPRR Program and command roles and responsibilities. As requested by commands, SARCs also coordinate training and outreach events in their AOR, including Bystander Intervention Training (BIT). In 2022, the Coast Guard conducted over 280 SAPRR training sessions plus more than 130 BIT sessions. Sessions averaged thirty attendees.

CGIS conducts informal outreach from local field offices to new commands within their AOR. They discuss CGIS and command roles and responsibilities under COMDTINST 5520.5 (series). CGIS also participates in leadership courses, like the Prospective Commanding Officer/Prospective Executive Officer (PCO/PXO) Course, as the training center's schedule allows.

Some units have engaged in their own awareness and prevention events. For example, the USCGC MIDGETT combined leadership and diversity training with sexual assault prevention modules to hold LDAC workshops with a SAPRR focus. SARCs report these activities to the SAPRR Program Coordinator. However, these are not reported in a standardized method that would allow the review team to state with certainty the number of activities or impacts on individual units.

Effectiveness of Awareness Efforts

All information indicates that the workforce is generally aware of existing policies related to SASH and AHHI. However, there is no evidence to indicate that the workforce members who do not work specifically in this field are aware of existing laws or relatively recent updates to the

UCMJ. There is little information to indicate the workforce is aware that the Coast Guard has tools, actions, and programs to prevent incidents of SASH and AHHI.

However, the information does indicate the workforce is aware that the Coast Guard has tools, actions, and programs to respond to events. There is anecdotal information from CGIS, SAPRR and AHHI staffs that command staff are generally aware of their roles upon reporting of an incident. There is also a noted improvement in current Command awareness and forward-leaning approach as compared to 10-15 years ago.

There is widespread agreement that it is challenging for Coast Guard members to find information and resources online. The Chaplain corps highlighted the need for accused members to be aware of available resources. There is quality information provided on the SAPRR and AHPO externally facing websites. The focus of this information is about resources and response to an incident rather than prevention. There is also information about crisis support resources on the externally facing MyCG website.⁹⁶ Links to and from the intranet SharePoint pages are unreliable, including broken links and links that require the member to navigate through several other pages to access program information or resources. The most readily available and widely known resource is the Employee Assistance Program, CGSUPRT.

However, this program is not designed to address matters surrounding sexual assault. There is not a single point of entry or website hub for a member seeking information about prevention or response to sexual assault, sexual harassment, and anti-harassment/potential hate incidents.

There is widespread agreement that Coast Guard civilians and their civilian and military supervisors do not understand what policies do or don't apply to civilian members. Nor do they know which resources are available.

In addition, the Coast Guard workforce is confused about specific language for each type of activity or issues. Terminology also differs between the legal language and the common language an aggrieved member or victim would use to describe their experience. The AHPO and other response personnel still need to provide commands with education about terminology, definitions, and actions to take when an aggrieved member or victim comes forward.

Anecdotal information shows that for a portion of the workforce there is not knowledge and understanding that sexual assault, sexual harassment, and other negative behaviors exist and still happen within the Service. Several comments responding to the ATR MyCG article, conversations with the review team, and field input to senior leadership clearly show that a portion of the workforce believes that these issues are Academy problems or inconsequential in other ways. There were also instances of members showing a misunderstanding between the concept of false reporting and a court martial proceeding ending in a not guilty verdict.

⁹⁶ "My CG, Crisis Support," U.S. Coast Guard, <https://www.mycg.uscg.mil/Resources/Article/2485426/crisis-support/>

Compliance with Existing Law and Policies

Sexual assault, sexual harassment, and anti-harassment/potential hate incidents continue to occur within the Coast Guard. These incidents occur at all types of units and at all levels within the workforce. Reviews of current reporting and various workplace surveys, which are the best proxy for unreported incidents, show that the number of incidents is not decreasing over time.

- After fiscal year (FY) 2017, when there were less than 30 sexual harassment cases, the number of cases has continued to rise. In FY 2021, there were 113 sexual harassment cases.
- From FYs 2013 – 2021, the total number of sexual assault reports ranged from 153 (including 31 restricted reports) to 238 (including 41 restricted reports) with FY 2016 having the least and FY 2018 the highest number of reports.
- In FY 2021, of the 113 sexual harassment cases, 79 cases were service member on service member and 90 were on military installations. The primary aggrieved person was junior enlisted (E2-E6) in 66 cases. The primary alleged responsible individual was junior enlisted in 58 cases.⁹⁷
- In FY 2021, of the 153 unrestricted sexual assault reports, 89 cases were service member on service member and 55 were on military installations and 70 were off military installations. The victim was junior enlisted (E2-E6) in 90 cases. The subject was junior enlisted in 46 cases. About 1/3 of the victims were male. Alcohol was known to be involved in about 1/3 of the cases.⁹⁸
- The 2018 WGR Survey of Active-Duty Members estimated that 184 Coast Guard women and 107 men experienced a sexual assault in the past year.⁹⁹ This survey does is limited to military members but indicates that there are many incidents of sexual assault not being reported to the Coast Guard.
- There is anecdotal information that individuals or commands may not report all incidences that are brought to their attention. The extent of this non-reporting is unknown.

Most authorities for handling SASH and AHHI reside with commanding officers. Levels of compliance at a command level are difficult to determine. For sexual assault and sexual harassment cases, CGIS has found most commands to be compliant with existing policies regarding reporting. For example, concerns such as a command not reporting to CGIS immediately are resolved quickly at the lowest level. It is rare for CGIS to need to raise concerns with a specific command to the District Commander level.

⁹⁷ "Sexual Assault in the U.S. Coast Guard FY21, Report to Congress," (November 2022), U.S. Coast Guard, https://www.dcms.uscg.mil/Portals/10/Sexual%20Assault%20in%20the%20U_S_%20Coast%20Guard%20%28FY%202021%29.pdf.

⁹⁸ Ibid.

⁹⁹ "2018 Workplace and Gender Relations Survey of Active Duty Members: Overview Report," (May 2019), Office of People Analytics, Department of Defense, <https://www.opa.mil/research-analysis/health-well-being/gender-relations/2018-workplace-and-gender-relations-survey-of-active-duty-members-reports-infographics/2018-workplace-and-gender-relations-survey-of-active-duty-members-overview-report/>, 212.

The AHHI policy sets strict timelines for commands to investigate and release a Final Action Memo. The superior commander is responsible for ensuring deadlines are met. The newly established AHPO is reviewing potential measures to improve policy compliance. As described, an AHHI investigation is a command-driven process and investigation quality and consistency across the Coast Guard is unknown. The AHPO is focused on improving training and guidance for convening authorities and AHHI investigating officers.

Commands are responsible for execution of remedial or corrective measures noted in the final action memos. As per DHS policy, the AHPO is required to conduct a 90-day post-decision follow-up with victims of substantiated incidents to determine if the harassment has continued or reprisal has occurred. This requirement is not being fully met due to low staffing levels at the newly established AHPO.

Recommendations

ISSUE 1: Junior personnel may not have requisite knowledge.

- **Recommendation 1:** Recommend inclusion of SAPRR and AHHI policies and prevention topics in the current EPME Occupational Analysis (OA) and a timely, thorough review and update of EPQ and service-wide questions to align with Commandant's Intent to counter sexual harassment and sexual assault.

ISSUE 2: SAPRR matters are best conveyed in-person by subject matter experts.

- **Recommendation 2:** Review options to return to a mandatory in-person training sessions for prevention of sexual harassment and sexual assault.
- **Recommendation 3:** Recommend SARC travel funding be provided for year-round awareness and prevention unit engagement.
- **Recommendation 4:** Recommend increase in number of SAPRR professionals with PERJC (Instructor Competency code) qualification to meet need for increased, in-person training and engagements. Recommend standardized SARC engagement reporting methodology so the SAPRR Program Coordinator can identify any units that have not received in-person engagement on a regular basis.

ISSUE 3: Challenging for members to find SAPRR and AHHI information and resources.

- **Recommendation 5:** Create an online Resources Hub (electronic performance support) for the entire workforce for ready access to information regarding awareness, prevention, accountability, victim support and recovery. Provide clear information in an easily digestible format, that communicates the reality and extent of sexual assault, sexual harassment, and other negative behaviors that are currently happening within the Service. Provide ready access to reports and surveys to highlight organizational transparency. Provide information about recent changes to SAPRR and AHHI policies. Develop TTP or educational document to bring awareness of potential differences in terminology between legal and policy definitions and the common language an aggrieved member or victim would use to describe their experience. Highlight key information about resources and tools including the Catch a Serial Offender Program (CATCH) Program and Veteran Affairs Centers. Develop informational document to direct military members and their supervisors to existing policies and options to reduce career ramifications of reporting.
- **Recommendation 6:** Provide civilian-specific information and updates about AHHI and SAPRR programs to civilian workforce and their supervisors using the Advisory Notice from Civilian Human Resources.

ISSUE 4: Portions of the workforce believe SASH and AHHI misinformation.

- **Recommendation 6:** As part of the online Resources Hub, provide clear information for All Hands regarding the rare instances of false reports of sexual assault as compared to the factors that may lead to a court martial proceeding ending in a not guilty verdict.
- **Recommendation 7:** Provide clear information for All Hands regarding the difference between substantiated harassment claims and false reporting.

APPENDIX A - Acronyms

ACE	Adverse Childhood Experiences
AHHI	Anti-Harassment and Potential Hate Incident
AHPO	Anti-Harassment Program Management Office
ALP	Apprentice Leadership Program
AOR	Area of Responsibility
BIT	Bystander Intervention Training
CDA	Consolidated Disposition Authority
CGA	Coast Guard Academy
CGIS	Coast Guard Investigative Service
CPOA	Chief Petty Officer Academy
CATCH	Catch A Serial Offender Program
DEOCS	Defense Organizational Climate Survey
DCMS	Deputy Commandant for Mission Support
DCO	Deputy Commandant for Operations
DCO course	Direct Commission Officer course
DHS	Department of Homeland Security
DOD	Department of Defense
EPME	Enlisted Professional Military Education
EPQ	Enlisted Performance Qualifications
FAM	Final Action Memorandum
FORCECOM	Force Readiness Command
GMT	General Mandated Training
GS	General Schedule
IPP	Integrated Primary Prevention
IRC	Independent Review Commission
JAG	Judge Advocate General
LAMS	Leadership and Management School
LDAC	Leadership Diversity Advisory Council
LOE	Line of Effort
MPO	Military Protective Order
OCP	Office of the Chief Prosecutor
OSD	Office of the Secretary of Defense
OSIE	On-Site Installation Evaluation
PSC	Personnel Service Center
SAGR	Service Academy Gender Relations
SAPC	Sexual Assault Prevention Council
SAPR	Sexual Assault Prevention, and Response (used until 2018)
SAPRR	Sexual Assault Prevention, Response, and Recovery
SARC	Sexual Assault Response Coordinator
SASH	Sexual Assault and Sexual Harassment

STC	Special Trial Counsel
SVC	Special Victims' Counsel
TPO	Terminal Performance Objective
UCMJ	Uniform Code of Military Justice
USCG	United States Coast Guard
VA	Victim Advocate
VAPS	Victim Advocate Program Specialist
VVA	Volunteer Victim Advocate
WGR	Workplace Gender Relations
WWRC	Workforce and Wellness Resiliency Council

APPENDIX B - Methodology

In conducting the review, the ATR team divided its focus between a travel team led by RADM Lafferty and MCPO Logan and a writing team whose efforts focused on research and writing.

To baseline our efforts, the team met with Coast Guard specific and other Program Offices to establish a current understanding of policies and ongoing initiatives. The team met with: CG-114, CG-1, CG-092, CG-094, CGIS, DoD SAPRO, TMX, Chief Trial Judge, Civil Rights Directorate, Chaplains, Office of Chief Prosecutor, DoD OPA, CG-11, AHPO, DCMS, DCMS-DPR, Insider Threat Program.

In addition, we met with Affinity Groups.

There is an extensive history of Coast Guard studies and data related to sexual assault, sexual harassment, harassment, and the behaviors that lead to them. The team reviewed relevant elements of key studies to include:

- 1990 Women in the Coast Guard Study, COMDTPUB 5312.17
- Culture and Climate Assessment of the U.S. Coast Guard Academy, Princeton Economic Research Inc, July 1992
- Charting Progress, The Assessment of Core Values in the U.S. Coast Guard, CDR Patrick T. Kelly 1999
- U.S. Coast Guard Academy Comprehensive Climate and Culture Optimization Review Effort, C3ORE Task Force Study, February 2007
- Culture Of Respect (COR) Integrated Process Team (IPT) Phase I Report, Performance Technology Center, Analysis, Acquisition, & Evaluation Branch, April 2015 (REPORT IS FOR OFFICIAL USE ONLY)
- U.S. Coast Guard Academy 2017 Vital Signs Report, Debbie Hanson and Dr. Estela Mara Bensimon, USC Rossier Center for Urban Education, 2017
- 2018 Workplace and Gender Relations Survey of Active-Duty Members, Overview Report, Appendix E. Coast Guard Overview Report, Department of Defense, Office of People Analytics, May 2019
- Improving Gender Diversity in the U.S. Coast Guard Identifying Barriers to Female Retention, Homeland Security Operational Analysis Center, 2019
- Why do Women Leave the Coast Guard, and What Can Be Done to Encourage Them to Stay, Brief, Homeland Security Operational Analysis Center, 2019
- Righting the Ship, The Coast Guard Must Improve its Process for Addressing Harassment, Bullying, and Retaliation, U.S. House of Representatives, Committee on Oversight and Reform, Committee on Homeland Security, Majority Staff Report, December 2019

- U.S. Coast Guard Core Values Research Report, Market Point LLC, July 2020
- Strengthening Diversity and Inclusion through Core Values, U.S. Coast Guard Office of Diversity and Inclusion FY2021
- Improving the Representation of Women and Racial/Ethnic Minorities Among U.S. Coast Guard Active-Duty Members, Homeland Security Operational Analysis Center, 2021
- The Relationship Between Sexual Assault and Sexual Harassment in the U.S. Military, Findings from the RAND Military Workplace Study, RAND, 2021
- An Assessment of Cultural Competence at the United States Coast Guard Academy, National Academy of Public Administration, February 2022
- Sexual Assault: DoD and Coast Guard Should Ensure Laws Are Implemented to Improve Oversight of Key Prevention and Response Efforts, U.S. Government Accountability Office, March 2022
- 2022 U.S. Coast Guard Service Academy Gender Relations Survey, Overview Report, Department of Defense, Office of People Analytics, April 2023
- Hard Truths and the Duty to Change: Recommendations from the Independent Review Commission on Sexual Assault in the Military
- Addressing Sexual Violence in the Armed Forces: A Practical Guide, August 2022, Organization for Security and Co-operation in Europe
- 2023 Military Service Academies On-Site Installation Evaluation Report

The travel team’s purpose was to hear what people think about current training, policies, and procedures relating to sexual assault and sexual harassment (SASH). The team also wanted to hear firsthand about experiences people were having in the field, including gaps in training or knowledge, difficulties with command climate, and issues with SASH reporting.

The travel team was intentional when planning unit visits, starting with units most military members in the Coast Guard attend at some point in their careers: accession points (Coast Guard Academy and TRACEN Cape May) and training centers (Yorktown, Petaluma, Maritime Law Enforcement Academy, Aviation Training Center). In conjunction with those visits, the team visited LANT and PAC Areas, District personnel, consolidated Chiefs’ Messes, major cutter commands and crews, Sectors, Bases, and Air Stations. The team also visited some remote small boat stations and Marine Safety Units located in D9.

The first visit, to CGA, was comprehensive and included meetings with the following:

- Superintendent, Assistant Superintendent, CMC
- Commandant of Cadets, Company officers
- SARC, VAPS, D1 EAPC, SJA & Deputy SJA, SVCs, Medical, and Chaplain
- Coast Guard Academy Alumni Association
- Consolidated Chiefs Mess
- Provost and Faculty
- Leadership & Development Center Command & Operations Dept., Leadership & Organizational Performance Dept., Officer Accessions & Transition, Performance Dept.

Training Center Cape May:

- Command Cadre
- SJA, CGIS, SARC, VAPS, Chaplain
- Medical Staff including Behavioral Health
- Consolidated Chiefs Mess
- Company Commanders

Training Center Yorktown:

- Command Cadre
- Support Staff including: SARC, EAPC, SJA, SVC, VA, CGIS, Medical, Chaplain
- Training Division: Dept. Heads & School Chiefs
- Instructors & VAs
- Chiefs Mess
- Student Focus Group comprised of Boot Camp to A School Students, A & C School Students

LANT Area & Portsmouth:

- LANT Deputy, CMC
- D5 Chief of Staff
- CGC BEAR, CGC NORTHLAND Commands

Maritime Law Enforcement Academy & Charleston Units:

- MLEA Command
- MLEA Instructor Development Course Students & Staff
- Consolidated Chiefs Mess
- Students from Basic Boarding Officer Course & ME A School
- CGCs HAMILTON & STONE Commands & Crews
- Base Charleston All Hands

National CPOA / CGEA Convention:

- Gold Badge Panel (General Session)

Training Center Petaluma:

- Command Cadre
- Chief Petty Officers Academy & Local Chiefs Mess
- Training Officer, Training Division Officers, School Chiefs
- SJA, SARC, VAPS, FAS, Fire Dept, HSWL Staff, VA, CGIS, Chaplain
- A School Students (Selected by School Chiefs)
- Instructors for A & C Schools
- Engineering & Admin Staff from TRACEN
- Alumni Interview

Alameda Units:

- PAC Area & D 11 Leadership and Staff
- Major Cutter Focus Groups (CGCs POLAR STAR, BERTHOLF)

- Command Cadres
- E-5 and below
- E-6 and above
- Base Service Providers & Support
 - SARC, SVC, VAs, Chaplain
- Base Alameda Command & Chiefs Mess

Oregon Units:

- Sector Columbia River
 - Sector & Station Command Cadre
 - SARC, VA, CGIS, Chaplain
 - Sector Chief Mess
 - E-5 and below
 - E-6 and above
- CGC STEADFAST
 - Command
 - E-5 and below
 - E-6 and above
- Air Station Astoria & Base Astoria
 - Command Cadre
 - Senior Health Services Officer, EAPC, Work-Life Supervisor, HSWL Dept Heads & Medical Staff
 - Joint Chiefs Mess
 - Joint Dept Heads

D9 Units:

- D9 Leadership & VAPS
- Station Marblehead
 - All Hands
- MSU Toledo
 - All Hands
- Station Toledo
 - All Hands
- Station Belle Isle
 - All Hands
- Station St. Clair Shores
 - All Hands

The second visit to the Coast Guard Academy focused on meetings with Cadets and Staff:

- 1/c Regimental & Battalion Staff
- 1/c & 2/c Company Commanders, XOs & Guidons
- 1/c, 2/c, 3/c, 4/c Focus groups
- Provost's Council
- Coast Guard Academy Affinity Groups

- Cadets Against Sexual Assault (CASA) & Cadet Peer Support group (CPS)
- Summer Assignment 1/c & 3/c
- Senior Enlisted Leadership Class
- Faculty Senate

During these visits, the team met with Command and/or staff first, then conducted listening sessions with various paygrades, and civilians, and where available, SASH support personnel (SARC, VAPS, CGIS, etc.). At smaller units, the team met with all hands; at larger units, the team met with members specifically selected by their commands. The sessions started with a brief overview of Operation Fouled Anchor, discussion of the Commandant's charter to the ATR with the six lines of effort, then a general question about climate to encourage the group to speak freely. People were very willing to speak up and ask questions, share ideas and stories, discuss gaps in training (or lack of training). At each unit, people kept the team after the meeting to ask questions or provide further insight into discussions.

The team also created a feedback tool for personnel to submit anonymous comments, suggestions, and input. We received considerable input – over 175 responses. The team reviewed each response, and the input was considered as part of our efforts. In addition, there were many victims that reached out to share their stories, experiences, and recommendations with the team.

Against the backdrop of researching previous studies, examining available data, and considering the information provided by programs, unit visits, and the input through the anonymous comment box, the team reviewed Coast Guard authorities and policies associated with each LOE. We benchmarked those authorities and policies against our directive to drive actionable change to guarantee the right to a safe workplace and an environment free from harassment, bullying, discrimination, retaliation, and assault, as well as the behaviors that fuel them, for all service members.¹⁰⁰

¹⁰⁰ We recognize that the issue of sexual assault and sexual harassment exists as part of a larger societal issue, as a military issue, and in the context of educational and training institutions. We did not view our task as taking on a comparison between the Coast Guard vs society/other military services/colleges and military service academies. In transparency, the information for DoD and the Military Service Academies is available at: [Gender Relations | Health & Well-Being | Research & Analysis | OPA.mil](#).

APPENDIX C - Academic

1. Basile, K.C. A comprehensive approach to sexual violence prevention. *N Engl J Med*. 2015 Jun 11;372(24):2350-2. doi: 10.1056/NEJMe1503952. PMID: 26061841; PMCID: PMC4699676.

“Quick, single-session sexual violence interventions are not effective and may actually be harmful” (because they often overly-emphasize the responsibility of the victim to stop it themselves; see DeGue, et. al. below). Alcohol and drug use is a factor in age/environmental conditions. “Rates of sexual harassment and stalking victimization and perpetration were lower at a college with a bystander-training program than at two colleges without such a program” Evidence and studies are currently focused on college-age adults, 18-24, but the data shows we must start younger (middle school). Community, relationships, and larger society need to be addressed, vice placing the onus on victims to protect themselves.

2. Banton, K., Williams, R., & Housman, J. (2023). Systematic review of college-based bystander interventions to reduce sexual violence. *Health Behavior and Policy Review*, 10(2), 1204–1217. <https://doi.org/10.14485/hbpr.10.2.2>

An analysis of current studies which show a popularity in bystander intervention training on college campuses, however, moderate and long-term studies are needed to understand how lasting the effects of the training are. Analysis also states that more study is needed to determine why individuals intervene in both low and high-risk sexually violent situations – it may or may not be because they’ve received bystander intervention training.

3. Freyd, J.J. & Smidt, A. M. (2019) So you want to address sexual harassment and assault in your organization? Training is not enough; Education is necessary, *Journal of Trauma & Dissociation*, 20:5, 489-494, DOI: 10.1080/15299732.2019.1663475

Study suggests a reframe of sexual violence training to sexual violence education; in order to make the learning associated with the acquisition of knowledge (which has more meaning to adult learners), versus something compliance-based (which is often dreaded by adult learners). “Single-session trainings – a common format in universities and workplaces – are often completed in an online, video-based format, and cannot possibly cover all of the types/presentations of sexual violence. However, *continuing education* on these topics can. Beyond annual compliance requirements, educational sessions should be held by professionals in the field and each session could cover a different focus, thereby supporting continual learning.

4. DeGue, S., Valle, L. A., Holt, M. K., Massetti, G. M., Matjasko, J. L., & Tharp, A. T. (2014). A systematic review of primary prevention strategies for sexual violence perpetration. *Aggression and violent behavior*, 19(4), 346–362. <https://doi.org/10.1016/j.avb.2014.05.004>

An oft-cited article evaluating 104 scientifically rigorous (e.g., control group vs. treatment group) studies into sexual violence prevention programs between 1985-2012, with the following take-aways: “The majority of sexual violence prevention strategies in the evaluation literature are brief, psycho-educational programs focused on increasing knowledge or changing attitudes...which have no evidence of effectiveness on sexually violent behavior...” Research is

lacking in the area of changing the sexually violent behavior of offenders through training, which should be a consideration in evaluating effectiveness of training programs. “Research indicates that preventative interventions are most successful when they include interactive instruction and opportunities for active, skills-based learning (Nation et al., 2003). Prior reviews of sexual violence prevention programs also suggest that engaging participants in multiple ways (e.g., writing exercises, role plays) and with greater participation may be associated with more positive outcomes (Paul & Gray, 2011). “Our findings suggest that the dose received by participants is often small. Three-quarters of interventions had only one session, and half of all studies involved a total exposure of 1 h or less. While it may be possible to impact some behaviors with a brief, one-session strategy, it is likely that behaviors as complex as sexual violence will require a higher dosage to change behavior and have lasting effects. Indeed, we found that interventions with consistently positive effects in this review tended to be 2 to 3 times longer...” Emphasis was also placed on addressing societal and community effects, (e.g., victim blaming behaviors) need to understand cultural relevance.” It is more effective to have well-trained staff such as sexual violence practitioners deliver the training. Additionally, if learners feel the environment in which they are learning contradicts, or in other ways does not align with the message(s), they will not learn and may actually be resistant to the message(s).

5. Devine, M. P., "Bystander Self-Efficacy To Prevent Sexual Assault: An Evaluation Of The Impacts Of Online And In-Person Bystander Intervention Training" (2018). Theses and Dissertations. 2198.

A thesis which includes a comprehensive literature review and analysis showing that individuals who took bystander prevention training online (“Take Care” or “Think About It” programs) had lower self-efficacy results than those who attended in person (Green Dot). Either training method is superior to the control groups which received no bystander intervention training. This research included over 300 participants in both online, hybrid, and face-to-face learnings. Tangentially, the author leans heavily on other academic research which concludes that online learning and retention of any subject matter depends heavily on the learner’s motivation for the subject. Author also cites research which show that in person learners score better on exams than online learners. In regard to bystander intervention, students who attended in person (Green Dot) felt most comfortable intervening in a potential sexually violent situation.

6. Htun, M., Jensenius, F. R., Dominguez, M. S., Tinkler, J., & Contreras, C. (2022). Effects of Mandatory Sexual Misconduct Training on University Campuses. *Socius*, 8. <https://doi.org/10.1177/23780231221124574>

One-time university sexual misconduct education actually made women 12% less likely to report and showed an increased fear of retaliation for females. More positively, participants showed an increase in knowledge about and attitudes toward sexual violence. “Our findings echo the results of other studies showing that one-time sexual misconduct training may be of limited efficacy (DeGue et al. 2014; Dobbin and Kalev 2019; Magley et al. 2013; National Academies of Sciences, Engineering, and Medicine 2018).” More research is encouraged in the medium and long-term effects of training. “Studies show that effective trainings involve multiple sessions—as many as 10—not just one (Tharp et al. 2011). Trainings are ideally part of a comprehensive approach to prevention involving work on social norms, policy change, bystander intervention,

and community factors (Banyard, Moynihan, and Plante 2007; DeGue et al. 2014; Orchowski et al. 2020).”

7. Jouriles, E.N., Krauss, A., Vu, N. L., Banyard, V.L. & McDonald, R. (2018) Bystander programs addressing sexual violence on college campuses: A systematic review and meta-analysis of program outcomes and delivery methods, *Journal of American College Health*, 66:6, 457-466, DOI: 10.1080/07448481.2018.1431906

A meta-analysis of 24 cases analyzing outcomes from bystander intervention programs and the methods in which they were delivered. Students who attended such programs had better attitudes and were engaged in bystander behavior. Effects diminished over three months post-intervention education. The longer the learners spent in training, the more positive the outcomes were. Facilitator-led programs, as compared to video or online programs, saw greater positive outcomes, however – online and video programs were shorter in length as compared to facilitator-led. It is unclear if the delivery method itself is a detractor from learning intervention behaviors or if it is due to the duration of the delivery.

8. Kettrey, H. H., Thompson, M. P., Marx, R. A., & Davis, A. J. (2023). Effects of Campus Sexual Assault Prevention Programs on Attitudes and Behaviors Among American College Students: A Systematic Review and Meta-Analysis. *The Journal of adolescent health: official publication of the Society for Adolescent Medicine*, 72(6), 831–844. <https://doi.org/10.1016/>

This is a meta-analysis of studies on college campuses over a 20-year time span. In general, the campus programs that focused only on individuals and not a community-based approach saw less significant reduction in violence, even though knowledge of what sexual violence looks like increased. “80 eligible studies disseminated between 1991 and 2021 indicates campus sexual assault programs have a more pronounced effect on attitudes/knowledge than on violence...recommend programming efforts move beyond a focus on individuals and, instead, adopt an ecological perspective targeting individuals, social relationships, community factors, and societal factors.”

9. Mujal, G. N., Taylor, M. E., Fry, J. L., Gochez-Kerr, T. H., & Weaver, N. L. (2019). A systematic review of bystander interventions for the prevention of sexual violence. *Trauma, Violence, & Abuse*, 22(2), 381–396. <https://doi.org/10.1177/1524838019849587>

A review of 44 studies at US and Canadian universities. Half of studies were included in DeGue et al.’s research (cited above). The limitations in research are “how” and “why” the interventions worked. Some post-intervention training follow-up was immediate, others 1-3 months, others 7-12 months. Some studies lacked theoretical framework, upon which the results would be scientifically sound. There is a need for research done post-12-month follow-ups. Studies show a substantial rise in effectiveness of at least two programs: “Bringing in the Bystander and The Men’s Program.” Presentation, discussion, and active learning exercises, worked best for learner retention and carried over into real-world application. “The use of in-person bystander training can make positive changes in attitudes and behaviors by increasing awareness of a problem and [shared] responsibility to solve it.”

10. Potter, S. J. (2019). Bystander Intervention Prevention Strategies as a Solution to Addressing Sexual Harassment and Assault. *Journal of Community Psychology*, 35, 463-481.

Roughly quoted: The Social Ecology and Social Ecological models maintain that the bystander approach must encompass the following components for effective prevention efforts: (1) individual, (2) relational, (3) community, (4) institutional, and (5) societal (Bronfenbrenner 1977; Dahlberg and Krug 2002; Potter 2016). Organizational leadership must take the initiative in demonstrating that cultural change is necessary for preventing sexual violence. “Effective bystander prevention and intervention strategies increase community members’ awareness and knowledge of the problem, teach how to identify the problem, and provide them the skills to intervene when they see sexual harassment and assault occurring, about to occur, or in the aftermath of an occurrence” (Moynihan et. al., 2015). Societal change is possible, especially when all ranks, levels, classes are included in the solution – similar to the “Friends don’t let friends drive drunk” campaign that effectively lowered drunk driving incidents/deaths since its campaign began in the 1980s. Bystander intervention training solutions require more than one 20-minute class, and benefit from regular “booster” training sessions.

11. Senn, C. Y., Eliasziw, M., Hobden, K. L., Newby-Clark, I. R., Barata, P. C., Radtke, H. L., & Thurston, W. E. (2017). Secondary and 2-Year Outcomes of a Sexual Assault Resistance Program for University Women. *Psychology of Women Quarterly*, 41(2), 147–162. <https://doi.org/10.1177/0361684317690119>

Canadian study – Followed 1st and 2nd year university (woman only) two-year longitudinal study. Control group (400 women) with only literature/brochures. Treatment group (417 women) with four, three-hour sessions “Enhanced assess, acknowledge, act” (EACC) training sessions. Basically, how to intervene on their own behalf to stop sexual assault. Study concludes self-intervention is an important piece, but also that: “The best comprehensive strategy currently is education to influence the campus culture and teach students how to intervene on others’ behalf...” Noted substantial consequences of rape/assault: “Male acquaintances perpetrate the vast majority of these attacks. Many women students will experience the negative physical and mental health effects of rape (e.g., Basile et al., 2006; Perilloux, Duntley, & Buss, 2012); the distal effects of [sexual violence] increases in drug, alcohol, and tobacco consumption (e.g., Brener, McMahon, Warren, & Douglas, 1999; Deliramich & Gray, 2008; Young, Grey, Boyd, & McCabe, 2011); and the academic impacts such as lowered grades, dropping out of courses or university, and switching universities (Baker et al., 2016; Stermac, 2015).”

APPENDIX D - Industry

1. Antecol, H., & Cobb-Clark, D.A. (2003). Does Sexual Harassment Training Change Attitudes? A View from the Federal Level*. *Social Science Quarterly*, 84, 826-842.

A study “from the U.S. Merit Systems Protection Board (USMSPB) of the U.S. federal government to determine—separately by gender—the impact of sexual harassment training on the propensity of workers to define specific unwanted sexual behaviors in the workplace as forms of sexual harassment.” Training, (though no method was specifically identified), increased awareness (particularly for men) around behaviors that are forms of sexual violence. Widespread training for all staff was likely a factor in overall change of attitudes (i.e., the culture in which training occurred was affected, thus promoting positive change).

2. Bagdasarov, Z., Olson-Buchanan, J., & MacDougall, A. (2019). Improving sexual harassment and sexual assault training effectiveness by aligning training efforts with business strategy. *Industrial and Organizational Psychology*, 12(1), 84-88.
doi:10.1017/iop.2019.14

Workplace training strategies must be linked to overall business goals. Establishing the link between sexual violence training and organizational goals – such as improving workplace climate, higher productivity, or improved organizational reputation – provides a number of notable benefits both for those wishing to implement the training (i.e., I-O psychologists, HR professionals, training personnel) and for the organization and its members. This alignment ensures that training supports the organization’s mission and facilitates the attainment of organizational goals (Author, Bennett, Edens, & Bell, 2003; Reed & Vokola, 2006) ...helps to secure management support and corresponding resources...” Organizational buy-in encourages employees to apply the learned behaviors in the workplace, and potentially beyond.

3. Banyard, V.L., Plante, E.G. and Moynihan, M.M. (2004), Bystander education: Bringing a broader community perspective to sexual violence prevention. *J. Community Psychol.*, 32: 61-79. <https://doi.org/10.1002/jcop.10078>

Sexual violence is a community-based issue which requires community-based solution. “Research suggests that no singular program works for all participants, and individual differences (e.g., history of sexual violence) may impact the effectiveness of program messages.” Since 1975, overall research proves that active bystander training helps to deter other crimes such as robbery (i.e., criminals do not like to be seen), so a natural correlation to sexually violent crime was derived and researched to assess the strength of that correlation. “Of particular interest in this research is the finding that knowing that an abuser and victim are related seems to decrease a bystander’s likelihood of intervening. This is of particular importance given the finding that persons who know the victim are often the perpetrators of interpersonal violence such as sexual assault and domestic violence. In fact, more than 70% of rape or sexual assault victims know their attacker...To maximize the likelihood that bystanders will engage in prosocial helping behavior, they need to have an awareness of the problem and its negative impact on the

victim. They will be more likely to help if they are asked to make a commitment to help and to see themselves as partially responsible for solving the problem. They also need to view victims as not the cause of their own problems. Finally, bystanders need to feel that they possess the skills to intervene and have the opportunity to view individuals who model such behaviors.”

4. Dobbin, F., & Kalev, A. (2021, August 27). Why sexual harassment programs backfire. *Harvard Business Review*. <https://hbr.org/2020/05/why-sexual-harassment-programs-backfire>

Since the 1970s most U.S. organizations have sought to address sexual with mandatory training programs and formal grievance procedures. Nevertheless, some 40% of women (and 16% of men) still say that they’ve been sexually harassed at work—a number unchanged since the 1980s. Based on their study of more than 800 U.S. companies, with 8 million employees between the early 1970’s and early 2000’s, researchers at Harvard wanted to focus on if the training initiatives have affected women entering/serving in the managerial ranks. “Neither the training programs that most companies put all workers through nor the grievance procedures that they have implemented are helping to solve the problem of sexual violence in the workplace. In fact, both tend to increase worker disaffection and turnover.” The most promising intervention is bystander awareness training, such as Green Dot, which was studied in Army military settings. Using a train-the-trainer model is effective as long as the trainers stay on curriculum. “The U.S. Air Force has adopted a train-the-trainer model to deal with sexual assault, dating violence, and domestic violence throughout its ranks.” Also, manager training, which enlist all managers in the effort to address sexual violence. In companies that adopted manager-specific training programs, woman rising to managerial ranks increased wholly by 6%. And they argue that formal grievance procedures should be supplemented with voluntary dispute resolution and an ombuds office that can handle claims on victims’ terms. In terms of grievance procedures across industry, women of color were likely to face retribution in forms of threats, violence, or other tactics which led to them leaving the managerial ranks and/or company. Woman of color are more likely targets of harassment as compared to their white counterparts. “Our current [legal] grievance system puts victims at a distinct disadvantage, through unenforceable confidentiality rules, a high evidentiary bar, and punishments that leave harassers in place.” Alternate complaint systems (e.g., Ombuds office, voluntary – but not mandatory - mediated resolution) are recommended grievance procedures to assist victim advocacy.

5. Madera, J., Lee, L., & Dawson, M. (2019). Sexual harassment and sexual assault training: Consider the industry. *Industrial and Organizational Psychology*, 12(1), 96-99. doi:10.1017/iop.2019.17

Research in which the main takeaway was organizational buy-in. A restaurant-environment was studied where there was a disparity between the environment –sexual violence came from customers. It did not matter whether it was a high-end restaurant, or a budget-friendly option. Similar findings existed in hospitality, retail, and healthcare industries – where circumstances are often exacerbated by interactions with the public and 24-7 coverage. Organizations must address this matter at all ranks. Training scenarios or examples should reflect the appropriate audience in order to make it relevant.

6. McLaughlin, H., Uggen, C., & Blackstone, A. (2012). Sexual Harassment, Workplace Authority, and the Paradox of Power. *American Sociological Review*, 77(4), 625-647. <https://doi.org/10.1177/0003122412451728>

This study focused on women in positions of authority in primarily male-dominated sectors. Although manufacturing was a common industry, the Coast Guard is also a male-dominant force and should consider this research as – if nothing else - insightful. Gender, race, and class play a role in workplace sexual violence. Two main theories have emerged. “First, the vulnerable-victim hypothesis, suggests that more vulnerable workers—including women, racial minorities, and those with the most precarious positions and least workplace authority—are subject to greater harassment. The second, the power-threat model, suggests that women who threaten men’s dominance are more frequent targets. Although the matter is far from settled, research has found greater support for the paradoxical power-threat model, in which women in authority positions are most likely to face harassment ([Chamberlain et al. 2008](#)) and discrimination (Stainback, Ratliff, and [Roscigno 2011](#)). Women supervisors, who hold authority over some men, directly challenge the presumptive superiority of men.” In this research, workplace power is a significant predictor of harassment for females. Female supervisors are 138 percent more likely to experience any harassing behaviors, they report a rate of harassment 73 percent greater than that of non-supervisors, and they are nearly three and a half times as likely to subjectively interpret these experiences as sexual harassment. Colleagues and clients similarly harass women in leadership positions.

7. Medeiros, K., & Griffith, J. (2019). #Ustoo: How I-O psychologists can extend the conversation on sexual harassment and sexual assault through workplace training. *Industrial and Organizational Psychology*, 12(1), 1-19. doi:10.1017/iop.2018.155

The general theme is that there is evidence suggesting that sexual-violence trainings are effective in the short term, there is little evidence to suggest long-term attitudinal or behavioral change. This study focused on considering the individual differences, post-training support and follow-up, and training design matters in learner retention. Training programs must consider all of the aforementioned factors, especially training design, if they wish for individuals to learn and apply prevention strategies. Design should include relevant and realistic scenarios.

8. Orchowski, L. M., Berry-Cabán, C. S., Prisoek, K., Borsari, B., & Kazemi, D. M. (2018). Evaluations of sexual assault prevention programs in military settings: A synthesis of the research literature. *Military Medicine*, 183(suppl_1), 421–428. <https://doi.org/10.1093/milmed/usx212>

An analysis of Sexual Assault (SA) prevention studies from 2005-2016, in a military setting. The military is unique due to the inherent appreciation of “hypermasculinity”, which is a known contributor to sexual violence. Additionally, positions which excluded women until 2016 (e.g., special forces) contribute to gender divide. While “there is little research available on the impact of historical discrimination against women in the military, negative attitudes toward women are a [well-known] risk factor for gender-based violence.” “Six studies described five distinct SA prevention programs, including: (1) bringing in the Bystander (BITB); (2) the Know Your Power social marketing campaign; (3) the Men’s Program; (4) the Navy Sexual Assault Intervention Training Program (SAIT); and (5) the Sexual Assault Victim Intervention (SAVI). Three of these programs – BITB, The Men’s Program, and Know Your Power – are SA prevention approaches

previously implemented and evaluated among college students. Two of the programs – the Navy SAIT, and Navy SAVI – are SA prevention approaches specifically developed for the military.” None of the studies had evaluations past the four-month mark, meaning long term efficacy could not be determined. Only BITB had a set facilitator guide and 4-hour in person training requirement, however there was no oversight of the usage of the guidebook or time requirement. “Service members who participated in BITB were more likely to report engaging in one of the 117 bystander intervention behaviors over the 4½ month follow up period, in comparing to those who did not participate in BITB.” The Men’s Program was associated with a decrease in program participants self-reported likelihood to commit sexual violence. “A formal evaluation of evidence-based SA prevention efforts for various branches of the military is lacking. SA prevention programs conducted among military populations. Notably, the programs evaluated in these studies did not reflect the types of SA prevention programs currently being implemented in military settings by SAPRO. Taken together, these findings suggest that more attention is needed to build the evidence base for SA prevention in the military and to evaluate the prevention practices currently being implemented among service members.”

9. Perry, E., Kulik, C., Golom, F., & Cruz, M. (2019). Sexual harassment training: Often necessary but rarely sufficient. *Industrial and Organizational Psychology, 12*(1), 89-92. doi:10.1017/iop.2019.15

Training alone is highly unlikely to solve the complex issue of sexual violence. Over 30-years of data prove that there is no one solution, but to be successful it must be looked at as an organization-wide issue, not an individual matter. First, diagnose the organization’s (often internal) barriers to promoting positive cultural change, and then assess what type of training is the best solution for the organization. It won’t be one which attempts to fix people, so much as it is to fix a culture. Adequate resources are needed to address a climate which can reward or otherwise ignore problematic behaviors.

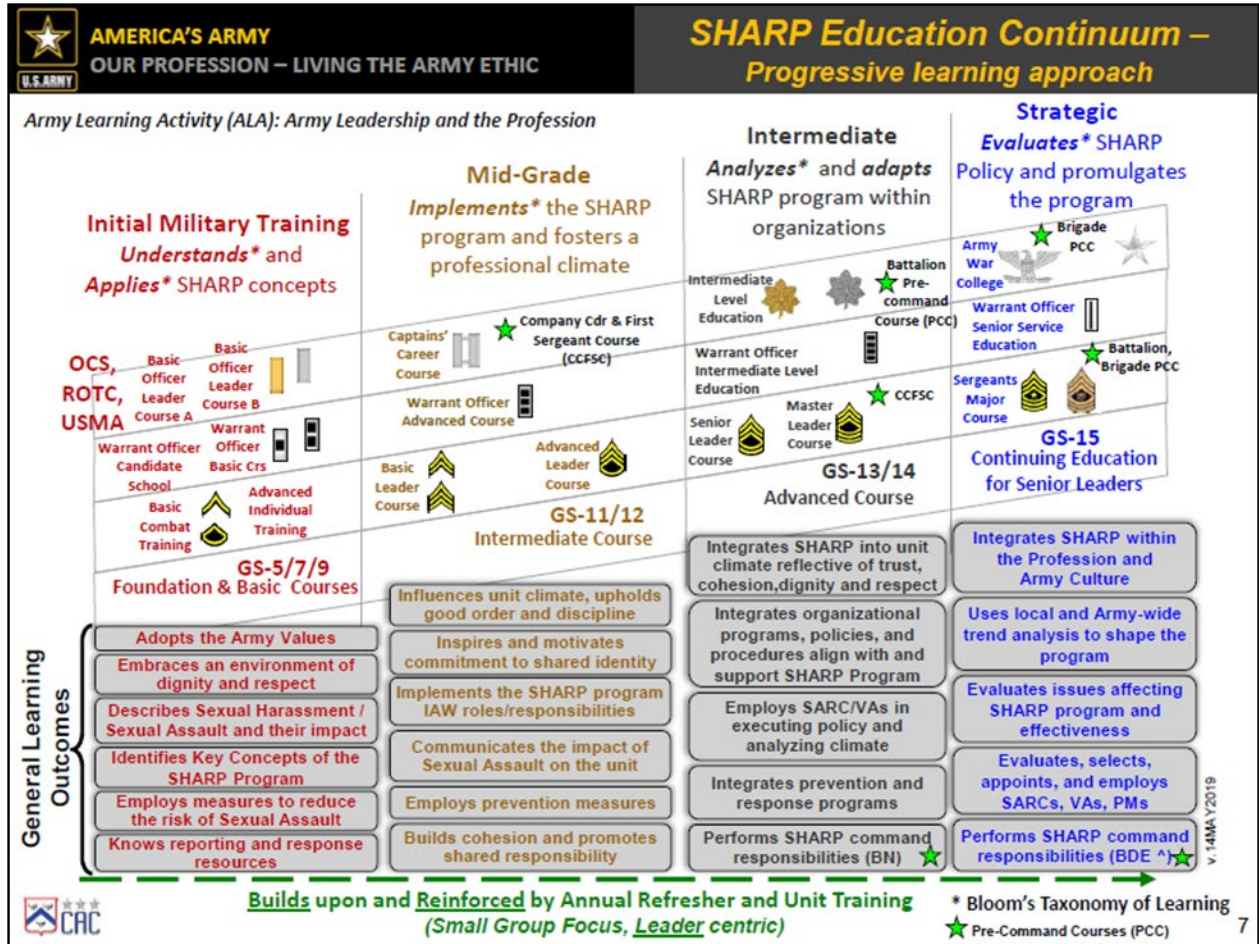
10. Rawski, S.L., Djurdjevic, E., Soderberg, A.T. *et al.* The Devil is in the Details: Sexual Harassment e-Training Design Choices and Perceived Messenger Integrity. *J Bus Ethics* (2023). <https://doi.org/10.1007/s10551-023-05479-w>

Loosely quoted... Training design choices determine training (in)effectiveness, potentially harming trainees and organizations. When training is administered on a large scale, such as e-Learning modules, and focuses on sensitive issues such as sexual violence, the ineffectiveness intensifies. Covering sexual violence via e-Learning can elicit trainees’ gender-based biases against the content, and in particular, the messenger of the content (e.g., an avatar). Results of this study suggest that trainees’ negative perceptions of the messenger increase when the messenger’s gender doesn’t match with their occupation, leading to worse training outcomes. These effects, however, are mitigated by increased media interactivity and richness.

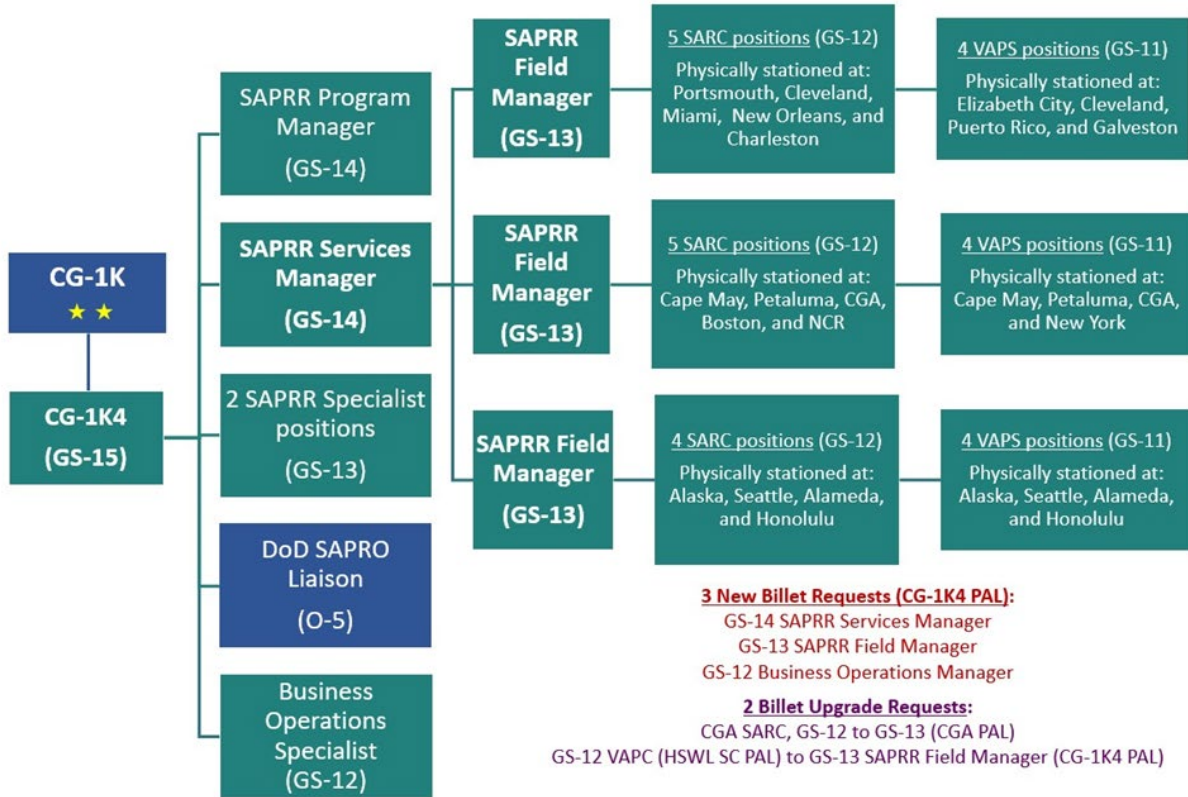
11. Sniffen, C., Durnan, J., & Zweig, J. (2018). Helping industries to classify reports of sexual harassment, sexual misconduct, and sexual assault. Washington DC: RALIANCE This report describes the work of a joint report between RALIANCE and the [Urban Institute](#), in which a team of staff from both agencies developed an improved taxonomy (a system of categorization) for reports of sexual violence received by [Uber Technologies, Inc.](#) (Uber), from users of Uber’s ride-sharing and other app-driven services. This improved taxonomy helps Uber

to more effectively categorize reports of these sexually violent experiences, which in turn helps Uber to better determine the most appropriate outreach and ultimate action taken in response to each report. The report also discusses the implications of this improved taxonomy for Uber's creation of transparency reports for sexual violence, and ways that this taxonomy and its method of development can improve similar efforts in other businesses and industries.

APPENDIX E - US Army Education Continuum



APPENDIX F – Proposed SAPRR Re-Organization



SAPRR Resources QR Code

