



GUIDELINES FOR FEDERAL RESEARCH AGENCIES TO REDUCE SEX-BASED AND SEXUAL HARASSMENT INVOLVING AWARD PERSONNEL

REPORT by the
INTERAGENCY WORKING GROUP ON SAFE AND INCLUSIVE STEM ENVIRONMENTS
FEDERAL COORDINATION IN STEM SUBCOMMITTEE
COMMITTEE ON STEM
of the
NATIONAL SCIENCE AND TECHNOLOGY COUNCIL

January 2025

About the National Science and Technology Council

The National Science and Technology Council (NSTC) is the principal means by which the executive branch coordinates science and technology policy across the diverse entities that make up the federal research and development enterprise. A primary objective of the NSTC is to ensure science and technology policy decisions and programs are consistent with the President's stated goals. The NSTC prepares research and development strategies that are coordinated across federal agencies aimed at accomplishing multiple national goals. The work of the NSTC is organized under committees that oversee subcommittees and working groups focused on different aspects of science and technology. More information is available at <http://www.whitehouse.gov/ostp/nstc>.

About the Office of Science and Technology Policy

The Office of Science and Technology Policy (OSTP) was established by the National Science and Technology Policy, Organization, and Priorities Act of 1976 to provide the President and others within the Executive Office of the President with advice on the scientific, engineering, and technological aspects of the economy, national security, homeland security, health, foreign relations, the environment, and the technological recovery and use of resources, among other topics. OSTP leads interagency science and technology policy coordination efforts, assists the Office of Management and Budget with an annual review and analysis of federal research and development in budgets, and serves as a source of scientific and technological analysis and judgment for the President with respect to major policies, plans, and programs of the federal government. More information is available at <http://www.whitehouse.gov/ostp>.

About the Committee on STEM

The Committee on STEM (CoSTEM) was first established in 2011 as the Committee on STEM Education pursuant to the requirements of Section 101 of the America COMPETES Reauthorization Act of 2010 (42 U.S.C. § 6621). It was renamed, in 2023, the Committee on STEM. More information is available at <https://www.whitehouse.gov/wp-content/uploads/2024/11/2024fedSTEMplan.pdf>. The Interagency Working Group on Safe and Inclusive STEM Environments (IWG-SISE) was chartered in response to Section 10536 of the 2022 CHIPS and Science Act (Pub. L. 117-167) and coordinates federal research agency efforts to reduce the prevalence of sex-based and sexual harassment involving federal research award personnel.

Disclaimer

Reference in this report to any product, service, enterprise, or individual, including any written works (i.e., books, articles, papers), is not an endorsement and is not intended to imply official government sanction or endorsement of those entities or their views. Links to non-U.S. government websites do not constitute or imply official U.S. government or OSTP endorsement of or responsibility for the opinions, ideas, data, or products presented at those locations, or guarantee the validity of the information provided.

Copyright Information

This document is a work of the United States government and is in the public domain (17 U.S.C. § 105). Subject to the stipulations below, it may be distributed and copied with acknowledgment to OSTP. Published in the United States of America, 2025.

GUIDELINES FOR FEDERAL RESEARCH AGENCIES TO REDUCE SEX-BASED AND SEXUAL HARASSMENT INVOLVING AWARD PERSONNEL

NATIONAL SCIENCE AND TECHNOLOGY COUNCIL

Chair

Arati Prabhakar, Assistant to the President for Science and Technology; Director, Office of Science and Technology Policy (OSTP)

Executive Director (Acting)

Lisa Friedersdorf, OSTP

COMMITTEE ON STEM (CoSTEM)

Co-Chairs

Kei Koizumi, Special Assistant to the President; Principal Deputy Director for Science, Society, and Policy, OSTP
Sethuraman Panchanathan, Director, U.S. National Science Foundation (NSF)

OSTP Liaison

Nafeesa Owens, OSTP

FEDERAL COORDINATION ON STEM SUBCOMMITTEE (FC-STEM)

Co-Chairs

James L. Moore, III, Assistant Director, Directorate for STEM Education, NSF
Nafeesa Owens, Assistant Director for STEM Education and Workforce, OSTP
Matthew Soldner, Acting Director, Institute of Education Sciences, U.S. Department of Education (ED)

Executive Secretary

Holly Hajare, OSTP

INTERAGENCY WORKING GROUP ON SAFE AND INCLUSIVE STEM ENVIRONMENTS (IWG-SISE)

Co-Chairs

Karen Andrade, OSTP (until 04/2024)
Eve Boyle, OSTP
Julie Carruthers, DOE
Rhonda Davis, NSF

Senior Advisor

Lisa Evans, HHS/NIH

Executive Secretary

Stephanie Mutchler, HHS/NIH

IWG Members

Tyler Hayes, USDA
Merardo Cruz, USDA
Erinn Izykowski, DOC
Jeremy Lawson, DOC/NIST
Janelle Johnson, DOC/NIST
Richard Grant, DOC/NOAA
Margaret Dressel, DOC/USPTO
Jason Day, DOD
Pat Zarate, DOE
Nastaran Ghazi, DOE
Ping Ge, DOE
Heather Lawson, HHS
Nicole Swann, DHS
Jenny Baier, DOI

Felicia Fullilove, DOS
Kelly Soluri, DOS
Yvette Rivera, DOT
Matt Nosanchuk, ED
Brandi Meredith, EEOC
Gul Chaudhry, EEOC
Melissa Anley-Mills, EPA
Jennifer Margolies, EPA
Kathryn Smith, EPA
Joeletta Patrick, NASA
Morgan Powell, NASA
Peggy Hoyle, NSF
Bob Cosgrove, NSF
Renee Ferranti, NSF

Tuwanda Smith, NRC
Stephanie Garland, NRC
Kaeley Pentek, ODNI
John Fellin, ODNI
Lisa Sheldon, ODNI
Teresa Parr, USAID
Olu Oisaghie, DPC
Rhea Fernandes, GPC
Brianna Yang, GPC
Suhasini Ravi, GPC
Yelena Tsilker, GPC
Nora Stein, OMB
Nafeesa Owens, OSTP

Table of Contents

Abbreviations	iii
Definitions	iv
Executive Summary	1
Introduction	2
Report Goals.....	4
1. Identify and Remove Gaps in Policies Pertaining to Sexual Harassment That Apply to Extramural Award Personnel	5
1a. Institute Policies that Apply to Award Personnel	5
1b. Consistency Across Harassment Definitions.....	6
1c. Consistency Across Policy Applicability	7
2. Improve Consistency Across Procedures for Reporting Harassment	7
2a. Overview of Pathway 1: Mandatory Notification, and Opportunities to Improve the Pathway 1 Process	8
2b. Overview of Pathway 2: Civil Rights Violation Reporting, and Opportunities to Improve the Pathway 2 Process	10
2c. Overview of Pathway 3: Option for Award Personnel and other Individuals to Share Information Without Filing a Complaint, and Opportunities to Improve Pathway 3 Process.....	12
3. Ensure Awareness Of, And Compliance With, Agency Harassment Policies and Reporting Procedures	13
3a. Improve Clarity and Readability of Policies and Reporting Procedures	13
3b. Frequently Share Information About Agency Policies and Reporting Procedures with Award Personnel	14
3c. Provide Training and Technical Assistance.....	15
3d. Engage in Proactive Compliance.....	16
3e. Improve Internal Communication of Agency Policies	16
4. Increase Data Transparency and Accountability to Support Evidence-Based Policy Improvements	17
4a. Transparency About Reports Received and Agency Actions Taken	17
4b. Iterative Policy Evaluation and Improvement	18
4c. Leverage Award Closeout and Existing Survey Instruments to Collect Data on Sex-Based and Sexual Harassment	19
4d. Agency-wide Strategic Planning.....	20
5. Prevent Sexual Harassment in Federally-Funded Off-Site Locations	20
5a. Off-campus or Field Research Sites or Technology-Facilitated Interactions	21
5b. Conferences and Professional Meetings that are Supported by Federal Funds.....	23
6. Support Innovative Approaches for Reducing Harassment in STEM Environments	24
6a. Improve Research Environments by Requiring Award Proposals to Include Plans for Safe, Inclusive, and Equitable Research	24
6b. Address Power Dynamics and Funding Structures in STEM.....	26
7. Provide Funding Opportunities for Sex-Based and Sexual Harassment Research, Evaluation, and Training	27
7a. Offer Funding for Awardees to Generate Evidence and Inform Best Practices	28
7b. Offer Funding for Training at Awardee Institutions.....	29
Conclusion	30
Appendix A. Further Areas to Explore for Federal Coordination	31
Appendix B. Recommendations Regarding Legislative Changes	33

Abbreviations

AOR	Authorized Organizational Representative
CoSTEM	Committee on STEM
DHS	U.S. Department of Homeland Security
DOC	U.S. Department of Commerce
DoD	U.S. Department of Defense
DOE	U.S. Department of Energy
DOI	U.S. Department of the Interior
DOJ	U.S. Department of Justice
DOS	U.S. Department of State
DOT	U.S. Department of Transportation
DPC	Domestic Policy Council
ED	U.S. Department of Education
EEOC	U.S. Equal Employment Opportunity Commission
EPA	U.S. Environmental Protection Agency
FAQs	Frequently Asked Questions
FC-STEM	Federal Coordination on STEM Subcommittee
FERPA	Family Educational Rights in Privacy Act
FY	Fiscal Year
FFRDCs	Federally Funded Research and Development Centers
GPC	Gender Policy Council
HR	Human Resources
HHS	U.S. Department of Health and Human Services
IWG-SISE	Interagency Working Group on Safe and Inclusive STEM Environments
LGBTQI+	Lesbian, Gay, Bisexual, Transgender, Queer or Questioning, Intersex + Other Gender Identities and Sexual Orientations
NASA	National Aeronautics and Space Administration
NIH	National Institutes of Health
NIST	National Institute of Standards and Technology
NOAA	National Oceanic and Atmospheric Administration
NRC	U.S. Nuclear Regulatory Commission
NSF	U.S. National Science Foundation
NSTC	National Science and Technology Council
OCR	Office for/of Civil Rights
ODNI	Office of the Director of National Intelligence
OMB	Office of Management and Budget
PI	Principal Investigator
R&D	Research and Development
STEM	Science, Technology, Engineering, and Mathematics
USAID	U.S. Agency for International Development
USDA	U.S. Department of Agriculture
USGS	U.S. Geological Survey
USPTO	U.S. Patent and Trademark Office

Definitions

Authorized Organizational Representative (AOR) - An administrative official who, on behalf of the proposing institution, is empowered to make certifications and representations and can commit the institution to the conduct of a project that an agency is being asked to support as well as adhere to various agency policies and award requirements.¹

Awardee/Awardee Institution – The legal entity to which federal assistance is awarded and that is accountable to the federal government for the use of the funds provided.² This includes, for example, institutions of higher education.

Award Personnel – Principal investigators and co-principal investigators, faculty, postdoctoral researchers, and employees supported by a grant, cooperative agreement, or contract under federal law.³

Extramural – Federally funded research and research-related activities at awardee institutions.

Federal research agency– Any federal department or agency with an annual extramural research expenditure of over \$100,000,000.⁴

Postdoc – Definitions vary across agencies, but postdocs positions are typically training positions for researchers with doctoral-level degrees that are term limited and prepare the individual for an independent career in research.⁵

Reported Individual – Award personnel who have been reported to a federal agency for potential sexual harassment violations.

Research and development (R&D)– Includes basic research, applied research, and experimental development. Basic research is experimental or theoretical work undertaken primarily to acquire new knowledge of the underlying foundations of phenomena and observable facts. Applied research is original investigation undertaken in order to acquire new knowledge, and directed primarily toward a specific practical aim or objective. Experimental development is creative and systematic work, drawing on knowledge gained from research and practical experience, which is directed at producing new products or processes or improving existing products or processes. Like research, experimental development will result in gaining additional knowledge. Experimental development includes the production of materials, devices, and systems or methods, including the design, construction, and testing of experimental prototypes. Experimental development also includes technology demonstrations in cases where a system or component is being demonstrated at scale for the first time, and it is realistic to expect additional refinements to the design (feedback R&D) following the demonstration.⁶

Research and development award – Support provided to an individual or entity by a federal research agency to carry out R&D activities, which may include support in the form of a grant, contract, cooperative agreement, or other such transaction. The term does not include a grant,

¹ Proposal & Award Policies & Procedures Guide (PAPPG) (NSF 24-1). U.S. National Science Foundation. https://nsf.gov/resources/nsf.gov/files/nsf24_1.pdf

² CHIPS and Science Act, Section 10002. <https://www.congress.gov/117/plaws/publ167/PLAW-117publ167.pdf>

³ CHIPS and Science Act, Section 10002. <https://www.congress.gov/117/plaws/publ167/PLAW-117publ167.pdf>

⁴ Guidance For Implementing National Security Presidential Memorandum 33 (NSPM-33) On National Security Strategy for United States Government-Supported Research and Development. 2022. National Science and Technology Council. <https://www.whitehouse.gov/wp-content/uploads/2022/01/010422-NSPM-33-Implementation-Guidance.pdf>

⁵ Defining Postdocs in the Survey of Graduate Students and Postdocs (GSS): Institution Responses to the Postdoc Definitional Questions in the GSS 2010–16. 2021. National Center for Science and Engineering Statistics. <https://nces.nsf.gov/pubs/nsf21327>

⁶ Guidance For Implementing National Security Presidential Memorandum 33 (NSPM-33) On National Security Strategy for United States Government-Supported Research and Development. 2022. National Science and Technology Council. <https://www.whitehouse.gov/wp-content/uploads/2022/01/010422-NSPM-33-Implementation-Guidance.pdf>

GUIDELINES FOR FEDERAL RESEARCH AGENCIES TO REDUCE SEX-BASED AND SEXUAL HARASSMENT INVOLVING AWARD PERSONNEL

award, contract, agreement, or other transaction for the procurement of goods or services to meet the administrative needs of a federal research agency.⁷

Senior/Key Personnel –Individuals who contribute in a substantive, meaningful way to the scientific development or execution of a research and development project proposed to be carried out with a research and development award from a federal research agency.⁸ These individuals may include principal investigators, co-principal investigators, and other faculty members and research support staff.

Trainees - Individuals appointed to and supported by a federal research training grant award. Trainees may receive such support at the undergraduate, predoctoral, and postdoctoral level.

⁷ Guidance For Implementing National Security Presidential Memorandum 33 (NSPM-33) On National Security Strategy for United States Government-Supported Research and Development. 2022. National Science and Technology Council. <https://www.whitehouse.gov/wp-content/uploads/2022/01/010422-NSPM-33-Implementation-Guidance.pdf>

⁸ Guidance For Implementing National Security Presidential Memorandum 33 (NSPM-33) On National Security Strategy for United States Government-Supported Research and Development. 2022. National Science and Technology Council. <https://www.whitehouse.gov/wp-content/uploads/2022/01/010422-NSPM-33-Implementation-Guidance.pdf>

Executive Summary

The Biden-Harris Administration has been committed to investing in science, technology, engineering, and mathematics (STEM) education, research, and innovation. Part of this commitment entails ensuring that barriers to participation in STEM are eliminated, and that STEM careers offer a safe, inclusive environment where all people can work toward solving the greatest scientific challenges.

The bipartisan CHIPS and Science Act, passed by Congress and signed into law by President Biden in 2022, tasked the National Science and Technology Council (NSTC) through Section 10536 to coordinate federal research agency efforts to reduce the prevalence of sex-based and sexual harassment involving research award personnel.

This report provides guidelines for federal agencies toward meeting this goal. It draws upon several strategies to reduce and prevent sex-based and sexual harassment put forth by researchers, practitioners, and other experts in STEM fields. These guidelines include recommendations for federal research agency action to assist in the development of improved harassment prevention and response policies. These guidelines also include recommendations for agencies to help cultivate inclusive STEM environments at awardee institutions that are free from sex-based and sexual harassment. Guidelines are presented in seven overarching categories:

1. Identify and remove gaps in policies pertaining to sexual harassment that apply to extramural award personnel
2. Improve consistency across procedures for reporting harassment to agencies across three pathways: mandatory notifications by awardee institutions; optional reporting by individuals of civil rights violation complaints; and optional reporting by individuals to provide information to agencies without filing a complaint.
3. Ensure awareness of, and compliance with, agency harassment policies and reporting procedures among federal employees, awardees, award personnel, and trainees.
4. Increase data transparency and accountability to support evidence-based policy improvements.
5. Prevent sexual harassment in federally-funded off-site locations, including field research sites and conferences.
6. Support innovative approaches for reducing harassment in STEM environments including requiring award proposals to include plans for safe, inclusive, and equitable research and instituting policies that address power dynamics in STEM.
7. Support funding opportunities for awardees to conduct sexual harassment policy research, evaluation, and training.

Addressing sex-based and sexual harassment in STEM will require coordinated efforts by federal research agencies, academic institutions, and the STEM research community. While the legal landscape continues to evolve, these guidelines provide a potential path forward for federal agencies to continue addressing harassment, breaking down barriers to participation, and ensuring that careers in STEM are viable and desirable for all.

Introduction

The bipartisan CHIPS and Science Act,⁹ signed into law by President Biden in 2022, authorizes historic investments in STEM education, research, and innovation. Eliminating barriers to participation in STEM and reducing attrition among STEM professionals is essential for achieving scientific progress.^{10,11,12} To address a prevalent barrier, Subtitle D of Title V of the law is dedicated to combating sexual harassment in science. As described in the CHIPS and Science Act, sexual harassment has been found to be widespread across institutions of higher education, impacting 58% of individuals in academic workspaces.¹³ Additionally, the CHIPS and Science Act includes findings that:

- Women from underrepresented racial and ethnic backgrounds are most likely to experience sexual harassment.
- Attrition related to harassment is a costly loss due to the dollars invested in STEM training.
- Harassment reporting procedures are inconsistent across federal research agencies.
- Agencies are not adequately communicating with each other and with research award recipients about reports of harassment.¹⁴

Section 10536 of the CHIPS and Science Act tasks the NSTC with coordinating federal research agency efforts to reduce the prevalence of sex-based and sexual harassment¹⁵ involving research award personnel. Per the legislation, “award personnel” are defined as “principal investigators and co-principal investigators, faculty, postdoctoral researchers, and other employees supported by a grant, cooperative agreement, or contract under federal law.”¹⁶ Specifically, NSTC was asked to 1) designate or establish an interagency working group to 2) create an inventory of federal research agency policies, procedures, and resources dedicated to preventing and responding to reports of sex-based and sexual harassment, 3) consult with external stakeholders to develop consistent policy guidelines for federal research agencies, including requirements for harassment reporting and other considerations intended to cultivate organizational climates that are intolerant of harassment, and 4) submit a report to Congress reflecting proposed policy guidelines.

In response, the NSTC’s Committee on STEM (CoSTEM) chartered the Interagency Working Group on Safe and Inclusive STEM Environments (IWG-SISE) in 2023 under the Federal Coordination on STEM Subcommittee (FC-STEM). Following the work of NSTC’s Subcommittee on Safe and Inclusive Research

⁹ CHIPS and Science Act, Subtitle D. <https://www.congress.gov/117/plaws/publ167/PLAW-117publ167.pdf>

¹⁰ Best Practices for Diversity and Inclusion in STEM Education and Research: A Guide by and for Federal Agencies. 2021. National Science and Technology Council. <https://www.whitehouse.gov/wp-content/uploads/2021/09/091621-Best-Practices-forDiversity-Inclusion-in-STEM.pdf>

¹¹ Best Practices for Reducing Organizational, Cultural, and Institutional Barriers in STEM Research. 2024. National Science and Technology Council. <https://www.whitehouse.gov/wp-content/uploads/2024/05/CoSTEM-IWGIS-Barriers-Report.pdf>

¹² Saxena A. 2014. Workforce Diversity: a key to improve productivity. *Procedia Economics and Finance*. [https://doi.org/10.1016/s2212-5671\(14\)00178-6](https://doi.org/10.1016/s2212-5671(14)00178-6)

¹³ CHIPS and Science Act, Section 10531. <https://www.congress.gov/117/plaws/publ167/PLAW-117publ167.pdf>

¹⁴ Sexual Harassment of Women: Climate, Culture, and Consequences in Academic Sciences, Engineering, and Medicine. 2018. National Academies of Sciences, Engineering, and Medicine. <https://nap.nationalacademies.org/catalog/24994/sexual-harassment-of-women-climate-culture-and-consequences-in-academic>

¹⁵ The CHIPS and Science Act does not provide a definition of sex-based and sexual harassment, and federal agency definitions vary. For the purposes of this report, IWG-SISE defines sex-based harassment and sexual harassment to be discrimination on the basis of sex that includes sex-based harassment and sexual harassment.

¹⁶ CHIPS and Science Act, Section 10002. <https://www.congress.gov/117/plaws/publ167/PLAW-117publ167.pdf>

GUIDELINES FOR FEDERAL RESEARCH AGENCIES TO REDUCE SEX-BASED AND SEXUAL HARASSMENT INVOLVING AWARD PERSONNEL

Environments,¹⁷ IWG-SISE compiled an inventory of federal agency harassment policies, procedures, and resources, with a focus on documents applicable to extramural research award personnel. This inventory was submitted to Congress and released to the public in February 2024.¹⁸ The inventory reveals that agencies have made efforts to reduce sex-based and sexual harassment among research award personnel by improving harassment policies and reporting procedures. However, harassment prevention and response policies still vary widely across agencies.

In addition, during external engagement sessions with the IWG-SISE, researchers, practitioners, and other experts suggested several strategies to reduce and prevent harassment across STEM environments. The strategies include:^{19,20,21,22}

- Increase compliance with civil rights laws and policies,
- Embed values of diversity, inclusion, and respect within institutions and workplaces,
- Empower leaders to implement institutional change and hold them accountable,
- Improve transparency and public awareness of harassment policies and complaint procedures,
- Diffuse the hierarchical and dependent relationship between trainees and advisors, and
- Offer effective training programs for personnel across the research ecosystem and provide support for people who experience harassment.

Congress and federal agencies have also received specific recommendations to address harassment, including providing improved protections against retaliation, requiring federally funded institutions and organizations to publicly release results of campus climate surveys and/or improve transparency around the number of sexual harassment reports filed and investigated, and providing funding for research on the effectiveness of policies designed to reduce the prevalence of harassment.²³ Reports have also recommended increasing agency support for anti-harassment policy research and evaluation, improving communication of sexual harassment policies, requiring awardee institutions to report when award personnel violate harassment policies, holding harassers accountable while mitigating impacts on other award personnel, and incentivizing institutions to increase compliance

¹⁷ Update from the National Science and Technology Council Joint Committee on Research Environments. 2019. White House Office of Science and Technology Policy. <https://trumpwhitehouse.archives.gov/wp-content/uploads/2019/07/Update-from-the-NSTC-Joint-Committee-on-Research-Environments-July-2019.pdf>

¹⁸ Interagency Working Group on Safe and Inclusive STEM Environments Inventory. 2024. National Science and Technology Council. <https://www.whitehouse.gov/wp-content/uploads/2024/02/Interagency-Working-Group-on-Safe-and-Inclusive-STEM-Environments-Inventory-2024.pdf>

¹⁹ Culture of Safety: Stopping Sexual Misconduct. 2024. American Physiological Society. <https://www.physiology.org/publications/news/the-physiologist-magazine/policy-iq/culture-of-safety-stopping-sexual-misconduct?SSO=Y>

²⁰ Clancy, et al. 2020. Use science to stop sexual harassment in higher education. PNAS. <https://www.pnas.org/doi/full/10.1073/pnas.2016164117>

²¹ Educating the White House on safe and inclusive STEM environments. 2024. American Psychological Association. <https://www.apaservices.org/advocacy/news/inclusive-field-stem>

²² Newsletter July-August 2024. 2024. Association for Women in Mathematics. <https://awm-math.org/wp-content/uploads/2024/07/AWM-News-July-August-2024-WEB.pdf>

²³ Sexual Harassment of Women: Climate, Culture, and Consequences in Academic Sciences, Engineering, and Medicine. 2018. Consensus Study Report: Highlights for Federal Policy Makers. National Academies of Sciences, Engineering, and Medicine. <https://nap.nationalacademies.org/resource/24994/Sexual%20Harassment%20of%20Women%20ReportHighlights-Federal%20Policy%20Makers.pdf>

with Title IX of the Education Amendments of 1972 and implement evidence-based policies that prevent and reduce harassment.²⁴

Report Goals

This report provides guidelines to support the efforts of federal research agencies to develop consistent sex-based and sexual harassment prevention and response policies, as required by the CHIPS and Science Act. These guidelines include recommendations for agency action and policy implementation. The first part of the report provides guidelines and recommendations for implementing policies and reporting procedures that apply to award personnel, ensuring award personnel are aware of these policies and reporting procedures, and holding agencies accountable to evaluating data provided in harassment reports in order to improve policy effectiveness. The first part of the report focuses on the following four areas:

1. Identify and remove gaps in policies pertaining to sexual harassment that apply to extramural award personnel.
2. Improve consistency across procedures for reporting harassment to agencies across three pathways: mandatory notifications by awardee institutions; optional reporting by individuals of civil rights violation complaints; and optional reporting by individuals to provide information to agencies without filing a complaint.
3. Ensure awareness of, and compliance with, agency harassment policies and reporting procedures among federal employees, awardees, award personnel, and trainees.
4. Increase data transparency and accountability to support evidence-based policy improvements.

This report also provides guidelines and recommendations for agencies designed to cultivate safe and inclusive STEM environments at awardee institutions. The second part of the report covers the remaining three areas:

5. Prevent sexual harassment in federally funded off-site locations, including field research sites and conferences.
6. Support innovative approaches for reducing harassment in STEM environments including requiring award proposals to include plans for safe, inclusive, and equitable research and instituting policies that address power dynamics in STEM.
7. Support funding opportunities for awardees to conduct sexual harassment policy research, evaluation, and training.

Finally, the report includes suggestions for future areas of coordination across federal agencies to combat harassment in STEM environments (Appendix A) and describes potential legislative changes that may support the efforts of federal agencies to fully implement the guidelines and recommendations (Appendix B).

The guidelines and recommendations were informed by numerous engagements with the STEM research community, harassment prevention experts, and staff from federal agencies. These engagements included but were not limited to: meetings with professional societies and nonprofit

²⁴ Sexual Harassment in STEM Research: Agencies Have Taken Actions, but Need Complaint Procedures, Overall Plans, and Better Collaboration. 2020. U.S. Government Accountability Office. <https://www.gao.gov/products/gao-20-187>

organizations; discussions with faculty, staff, postdoctoral fellows, and other researchers from institutions of higher education, including minority-serving institutions; and conversations with leaders from Federally Funded Research and Development Centers (FFRDCs).

1. Identify and Remove Gaps in Policies Pertaining to Sexual Harassment That Apply to Extramural Award Personnel

1a. Institute Policies that Apply to Award Personnel

A necessary first step to develop evidence-informed policies to reduce sex-based and sexual harassment in STEM environments is to identify which agencies have policies that apply to award personnel. Per the IWG-SISE agency policy inventory,²⁵ most federal research agencies/subagencies have policies and procedures that prohibit sex-based harassment and sexual harassment among extramural award personnel and/or identify the process for reporting harassment to the agency. Four agencies that administer STEM research and development awards did not supply sex-based and sexual harassment policies that apply to award personnel as a condition of federal research awards.²⁶

All institutions irrespective of the terms and conditions of a federal research and development award must follow policies pertaining to Title IX of the Education Amendments of 1972 and Title VII of the Civil Rights Act of 1964. Title IX of the Education Amendments of 1972 prohibits discrimination on the basis of sex, including sexual harassment and discrimination in education programs or activities that receive federal funding.²⁷ Title IX applies to all education programs or activities of recipients of federal financial assistance. Title VII of the Civil Rights Act of 1964 prohibits employment discrimination on the basis of race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), and national origin. These prohibitions also include sexual harassment and discrimination based on sexual orientation and gender identity or based on LGBTQI+ status.²⁸ Title VII applies to private, state, and local employers with fifteen or more employees, and to the federal government. Besides Title IX and Title VII, this report also highlights additional sex-based and sexual harassment policies that are specific to individual agencies and that awardee institutions specifically agree to comply with when accepting a federal research and development award.

Title IX and Title VII apply to recipients who receive a federal research award, including postsecondary institutions and local and state educational agencies. The recommendations in this report and definitions of sex-based and sexual harassment in the discussion of award personnel policies and reporting procedures regarding award personnel may differ from definitions of those terms under Title IX or Title VII. As such, the recommendations in this report largely pertain to federal agency policies that apply specifically to award personnel as a condition of an awardee institution accepting a research award. Where this report does speak to civil rights violation reporting (in section 2b), recommendations

²⁵ Interagency Working Group on Safe and Inclusive STEM Environments Inventory. 2024. National Science and Technology Council. <https://www.whitehouse.gov/wp-content/uploads/2024/02/Interagency-Working-Group-on-Safe-and-Inclusive-STEM-Environments-Inventory-2024.pdf>

²⁶ The federal research agencies and/or subagencies that fund extramural research award personnel but are not represented in the inventory include the U.S. Department of Homeland Security (DHS), the U.S. Department of Defense (DoD), U.S. Department of Education (ED), the National Institute of Standards and Technology (NIST).

²⁷ 20 U.S.C. § 1681. See also Title IX and Sex Discrimination. U.S. Department of Education. <https://www.ed.gov/laws-and-policy/civil-rights-laws/title-ix-and-sex-discrimination>

²⁸ Title VII of the Civil Rights Act of 1964. U.S. Equal Employment Opportunity Commission. <https://www.eeoc.gov/statutes/title-vii-civil-rights-act-1964>; <https://www.eeoc.gov/eo-policy-statement>

are offered to make it clearer that civil rights compliance reporting options provide a pathway for award personnel and other individuals at awardee institutions to report sex-based and sexual harassment to federal agencies. The discussion of award personnel policies and reporting procedures regarding award personnel in this report does not address recipient obligations under Title IX or Title VII, including those related to sex-based harassment.

Our review of agency submissions to the inventory and other agency policies on their websites revealed variation in the availability and prominence of agency policies related to sex-based and sexual harassment. For example, many agencies have publicly available information on civil rights protections, but few contain specific policies conveying what constitutes sex-based and sexual harassment and how sex-based and sexual harassment can be reported by award personnel.

- **Recommendation 1a.1:** All federal research agencies should institute policies that prohibit sex-based and sexual harassment involving award personnel as a condition of receiving a federal research and development award.

1b. Consistency Across Harassment Definitions

There are variations in definitions related to sex-based and sexual harassment communicated to awardees across federal agencies. Examples include briefly describing unwelcome conduct of a sexual nature;²⁹ providing descriptive but not exhaustive lists of examples of inappropriate conduct;³⁰ and definitions that cite non-federal references.³¹

Most agency definitions do not provide clear or extensive examples of unacceptable behaviors. Vagueness of agency definitions and inconsistent definitions across agencies may make it difficult for award personnel to identify the behaviors that will not be tolerated and what can and should be reported to relevant funding agencies. At a minimum, sex-based and sexual harassment policies that pertain to award personnel should address all forms of sex-based and sexual harassment, including *quid pro quo*, unwanted sexual attention, bullying, harassment, and assault.

- **Recommendation 1b.1:** Through interagency coordination bodies such as IWG-SISE, and/or with leadership from the Department of Education, Department of Justice, and Equal Employment Opportunity Commission, federal research agencies should collaborate to develop and implement a standard definition of sex-based and sexual harassment in policies that apply to award personnel as a condition of an awardee institution receiving a federal research and development award.
- **Recommendation 1b.2:** The government-wide, standard definition should be adopted by all federal research agencies and should:
 - Include definitions of sex-based and sexual harassment in policies that apply to award personnel as a condition of an awardee institution receiving a federal research and development award.

²⁹ Stopping Harassment and Assault. U.S. National Science Foundation. <https://new.nsf.gov/stopping-harassment#requirements-and-guidance-e15>

³⁰ Definitions. National Institutes of Health. <https://grants.nih.gov/grants/policy/harassment/definitions.htm>

³¹ Harassment. U.S. Department of Energy, Office of Scientific Workforce Diversity, Equity, and Inclusion. <https://science.osti.gov/SWI/DOE-Diversity-Equity-and-Inclusion-Policies/Harassment>

- Account for all possible forms of sex-based and sexual harassment and include a list of prohibitive behaviors.

1c. Consistency Across Policy Applicability

The federal research agency policies that apply to award personnel also vary in terms of applicability to location. Per the inventory, six agencies have policies that indicate applicability to awardee institutions, five agencies indicate that policies apply to federally-funded conferences, and 11 agencies list other locations.³² These include field sites, social media, vehicles, and anywhere funded activities were carried out.

Making clear that all activities supported by federal financial assistance are covered by agency policies can help award personnel understand which instances of harassment can or should be reported to agencies. At minimum, policies should clarify that sex-based and sexual harassment is prohibited in all venues supported by federal financial assistance. Such venues include but are not limited to work and learning sites, research environments (whether located at the awardee institution or not), field sites, research vessels, shared facilities, conferences and workshops, on virtual meeting and convening platforms, on social media platforms, through email, and any other location where federally funded activities are carried out.

- Recommendation 1c.1: Federal research agency sex-based and sexual harassment policies should clarify that such protections are not location-based and extend to all on-site and off-site activities sponsored by the federally-funded institution or organization.

There is also variation in definitions as to which individuals are covered by such policies. Agencies variably include principal investigators, postdocs, volunteers, beneficiaries, researchers, scientists, interns, officers, and affiliates as protected individuals.³³ Defining who is covered under agency policies can promote clarity in the extramural community regarding the rights, responsibilities, protections, and reporting options available to individuals supported by federal research funds.

- Recommendation 1c.2: Federal research agency policies that prohibit sex-based and sexual harassment among extramural award personnel should consistently and clearly indicate who is covered under the policy.

2. Improve Consistency Across Procedures for Reporting Harassment

Agency procedures for receiving reports of sex-based and sexual harassment follow three pathways: 1) mandatory notification by an authorized organizational representative (AOR) or official at an awardee institution, 2) optional reporting by award personnel or other individuals to file a civil rights complaint with the agency, and 3) optional reporting by award personnel and other individuals to share information without filing a complaint.

³² Interagency Working Group on Safe and Inclusive STEM Environments Inventory. 2024. National Science and Technology Council. <https://www.whitehouse.gov/wp-content/uploads/2024/02/Interagency-Working-Group-on-Safe-and-Inclusive-STEM-Environments-Inventory-2024.pdf>

³³ Interagency Working Group on Safe and Inclusive STEM Environments Inventory. 2024. National Science and Technology Council. <https://www.whitehouse.gov/wp-content/uploads/2024/02/Interagency-Working-Group-on-Safe-and-Inclusive-STEM-Environments-Inventory-2024.pdf>

2a. Overview of Pathway 1: Mandatory Notification, and Opportunities to Improve the Pathway 1 Process

Sex-based and sexual harassment is impermissible and is not tolerated by federal agencies, including within institutions that receive federal research and development awards. Stewardship of federal resources requires agencies to assess how sex-based and sexual harassment impact research personnel and their ability to carry out funded activities. One way to accomplish this is to require awardees to report findings of harassment committed by award personnel to agencies. After receiving this information, agencies can determine what subsequent actions they may need to take to ensure that federal research dollars are going to safe and productive STEM environments. Per the CHIPS and Science Act, this report is required to provide guidelines for agencies to require awardees to report findings of harassment and/or administrative actions taken in response to sex-based and sexual harassment committed by research award personnel.³⁴

As of the writing of this report, only three agencies require awardees to notify them of a finding or determination of harassment and/or an administrative action taken in response to sex-based and sexual harassment involving award personnel.^{35, 36, 37, 38} Additionally, the U.S. Department of State (DOS) has a mandatory incident reporting process for award institutions hosting foreign nationals on J-1 visas.³⁹ The mandatory notification processes at the National Aeronautics and Space Administration (NASA) and the U.S. National Science Foundation (NSF) were established through a term and condition of award.^{40, 41, 42}

At NASA and NSF, mandatory notification reports to the agency 1) are made by an AOR, 2) are only required when a finding or determination of harassment has occurred and/or an administrative action has been taken, and 3) only apply to instances involving a principal investigator (PI) or co- principal investigator (co-PI), not other senior or key personnel. Based on the reporting procedures at these agencies, it is recommended that:

- **Recommendation 2a.1:** All federal research agencies should require awardees—as a term and condition of an award—to report any finding or determination of sex-based and sexual harassment and/or an administrative or disciplinary action taken against principal investigators or co-

³⁴ CHIPS and Science Act, Section 10536. <https://www.congress.gov/117/plaws/publ167/PLAW-117publ167.pdf>

³⁵ Interagency Working Group on Safe and Inclusive STEM Environments Inventory. 2024. National Science and Technology Council. <https://www.whitehouse.gov/wp-content/uploads/2024/02/Interagency-Working-Group-on-Safe-and-Inclusive-STEM-Environments-Inventory-2024.pdf>

³⁶ Grant Information Circular. 2020. National Aeronautics and Space Administration. https://www.nasa.gov/wp-content/uploads/2021/01/gic_20-01_-_term_and_condition_on_grantee_harassment.pdf

³⁷ Institutional Reporting. National Institutes of Health. <https://grants.nih.gov/grants/policy/harassment/institutional-reporting.htm>

³⁸ Notification Requirements Regarding Findings of Sexual Harassment, Other Forms of Harassment, or Sexual Assault. 2018. U.S. National Science Foundation. <https://www.federalregister.gov/documents/2018/09/21/2018-20574/notification-requirements-regarding-findings-of-sexual-harassment-other-forms-of-harassment-or>

³⁹ Academic Program Sponsors. BridgeUSA. Department of State. <https://j1visa.state.gov/academic-program-sponsors/>

⁴⁰ NIH's policy on institutional reporting slightly differs from that of NASA and NSF, and was released in 2022 pursuant to Public Law 117-103, Division H, Title II, Section 239. It is not described here as an example for other agencies to consider for implementation.

⁴¹ Organizational Notification of Harassment Form. U.S. National Science Foundation. https://www.nsf.gov/od/oepr/awardee_civil_rights/notification_form.jsp

⁴² Term and Condition Required Notification of Harassment. National Aeronautics and Space Administration. <https://missionstem.nasa.gov/term-condition-institutional-harassment-discr.html>

GUIDELINES FOR FEDERAL RESEARCH AGENCIES TO REDUCE SEX-BASED AND SEXUAL HARASSMENT INVOLVING AWARD PERSONNEL

investigators to be completed by an AOR at the awardee institution. If possible, agencies should establish an online portal or web form for AORs to submit reports. The term and condition should require, at a minimum, that an AOR disclose the following information to agencies within 10 days of the date the finding/determination is made, or 10 days from when an awardee imposes an administrative action on the reported individual, whichever is sooner. Reports should include:

- Award number
- Name of PI or Co-PI being reported
- Awardee Name
- Awardee Address
- AOR name, title, phone, and email address
- Indication of the report type:
 - Finding or determination has been made that the reported individual violated awardee policies or codes of conduct, statutes, or regulations relating to sexual harassment, sexual assault, or other forms of harassment, as defined by the agency
 - Date that the finding/determination was made
 - Imposition of an administrative or disciplinary action by the awardee on the reported individual related to a finding/determination or an investigation of an alleged violation of awardee policies or codes of conduct, statutes, or regulations related to sexual harassment, sexual assault, or other forms of harassment, as defined by the agency
- The date and nature of the administrative/disciplinary action
 - A basic explanation or description of the event, which should not disclose personally identifiable information regarding any complainants or other individuals involved
 - Per the CHIPS and Science Act, any description provided must be consistent with the Family Educational Rights in Privacy Act (FERPA)
- Recommendation 2a.2: Agencies should assess the impact and feasibility of expanding the mandatory notification requirement to all senior/key personnel and postdocs. Per the definition of award personnel provided in the CHIPS and Science Act, this would expand the mandatory notification requirement beyond PIs and Co-PIs to include other senior/key personnel such as faculty, postdocs, and other employees supported by a research and development federal award.
 - Agencies should remain mindful that expanding the mandatory notification requirement beyond PIs and Co-PIs will increase administrative burden, both among awardees and agencies. Other senior/key personnel, while named on the budget agreement with the awardee institution, often change throughout the lifecycle of the award. Agencies should explore the practicality of expanding this reporting requirement, given the volume of funding awards they administer and the number of award personnel they fund, and consider what additional resources would be necessary for implementation.⁴³

Currently, the policies reviewed do not provide details of whether replacement or removal of an investigator from an award will be indicated on the investigator's profile with the agency or how long

⁴³ While graduate students may also be supported by federal research and development awards, they are not typically named in budget proposals as award personnel and are not typically a part of financial assistance award agreements. Given the dual role graduate researchers often play as both students and employees of awardee institutions, at this time, IWG-SISE does not recommend that findings/determinations of harassment or administrative action taken against federally-supported graduate students be included under mandatory notification policies (see Appendix A).

the information will be stored. Policies should provide these details and also indicate whether the investigator becomes ineligible for future awards for a time-limited period or permanently.

- **Recommendation 2a.3:** As part of the mandatory notification policy, agencies should clearly detail how the information provided by awardees will be considered and what the possible agency responses could entail. Agencies should make clear that responsive actions will be appropriate and proportional to the severity of the behavior found to have occurred.
 - Agencies may consider responsive actions based on the severity of the harassment, including the substitution or removal of the PI or any co-PI, reduction of the award funding amount, or suspension or termination of the award.
 - Agencies may also consider when to share the information within the interagency context e.g., when the incident involves a J-1 visa holder which requires the U.S. Department of State's mandatory incident reporting requirement.
- **Recommendation 2a.4:** Agencies should also indicate where digital records of mandatory notifications will be stored and whether an individual's personal information profile with an agency will temporarily or permanently reflect the notification report and/or agency action taken. This information should be easy to locate within an agency's mandatory notification policy.
 - Agencies should also indicate whether any responsive actions taken will impact the eligibility of the reported individual for future award consideration.

2b. Overview of Pathway 2: Civil Rights Violation Reporting, and Opportunities to Improve the Pathway 2 Process

Most federal research agencies have clear instructions on their websites for individuals at awardee institutions to report discrimination and harassment that violate civil rights protections, including Title VI of the Civil Rights Act of 1964; Title VII of the Civil Rights Act of 1964; Title IX of the Education Amendments of 1972; and the Age Discrimination Act of 1975.⁴⁴ Instructions vary from agency to agency, but agencies typically indicate what information should be included in a complaint and provide an email address and/or a physical mailing address to submit complaints. These civil rights compliance reporting options provide a pathway for award personnel and other individuals at awardee institutions to report sex-based and sexual harassment in a program or activity that received federal financial assistance, including federally-funded research programs. The recommendations provided in this

⁴⁴ Interagency Working Group on Safe and Inclusive STEM Environments Inventory. 2024. National Science and Technology Council. <https://www.whitehouse.gov/wp-content/uploads/2024/02/Interagency-Working-Group-on-Safe-and-Inclusive-STEM-Environments-Inventory-2024.pdf>

GUIDELINES FOR FEDERAL RESEARCH AGENCIES TO REDUCE SEX-BASED AND SEXUAL HARASSMENT INVOLVING AWARD PERSONNEL

subsection may improve the utilization of civil rights violation reporting mechanisms by award personnel and other individuals at awardee institutions.^{45,46,47,48, 49, 50,51, 52,53, 54,55}

- **Recommendation 2b.1:** All federal research agencies should provide clear and comprehensive instructions for civil rights compliance reporting procedures to award personnel. Agencies should make clear that award personnel and other individuals who have experienced, witnessed, or are aware of sex-based or sexual harassment in a federally-funded program can use these procedures to file complaints with the agency.
- **Recommendation 2b.2:** Reporting procedure instructions should also include information about other venues available to complainants for assistance.⁵⁶ This action would allow the person to consider their options and make a fully informed choice on how they'd like to move forward with their complaint.

Reporting information to a federal agency can be intimidating, especially for foreign nationals, trainees, and early-career investigators. Ambiguity or lack of details about the reporting process, potential outcomes, expected timeline, and retaliation protections can prevent individuals from reporting harassment. Students and postdocs are especially vulnerable, given that their career can be affected tremendously if certain actions are taken against the faculty that supervise them in response to filing a complaint. If potential complainants are not informed about the expected timeline of action, and when their institution may be alerted about the report, it can be difficult and extremely stressful to continue working in environments where they may be in contact with the harasser.

⁴⁵ To minimize duplication of efforts and to streamline information communicated to award personnel, agencies or subagencies are not encouraged to establish an additional process for individuals to file sex-based and sexual harassment complaints that is separate from an agency's or subagency's civil rights violation reporting process.

⁴⁶ Harassment and Discrimination Reporting for NASA Employees, Contractors and Grantee Beneficiaries. National Aeronautics and Space Administration. <https://missionstem.nasa.gov/filing-a-complaint.html>

⁴⁷ NSF Awardee Civil Rights Compliance Program. U.S. National Science Foundation. https://www.nsf.gov/od/oepr/awardee_civil_rights/index.jsp

⁴⁸ Awardee Discrimination Complaint Case Management System. U.S. National Science Foundation, Office of Equity and Civil Rights. <https://efiler.complaints.nsf.gov/etk-nsf-cr-prod/login.request.do>

⁴⁹ Discrimination Complaint Processing Manual for NSF-Assisted (Awardee Organization) and NSF-Conducted Programs. U.S. National Science Foundation, Office of Equity and Civil Rights.

https://www.nsf.gov/od/oepr/awardee_civil_rights/docs/Discrimination_Complaint_Processing_Manual.pdf

⁵⁰ Filing a Civil Rights Complaint. U.S. Department of Health and Human Services, Office for Civil Rights.

<https://www.hhs.gov/civil-rights/filing-a-complaint/index.html>

⁵¹ Civil Rights and Conscience and Religious Freedom Discrimination Complaint Form Package. U.S. Department of Health and Human Services, Office for Civil Rights. <https://www.hhs.gov/sites/default/files/ocr-cr-complaint-form-package.pdf>

⁵² What to Expect. U.S. Department of Health and Human Services, Office for Civil Rights. <https://www.hhs.gov/civil-rights/filing-a-complaint/what-to-expect/index.html>

⁵³ Laws & Regulations Enforced by OCR. U.S. Department of Health and Human Services, Office for Civil Rights.

<https://www.hhs.gov/civil-rights/for-providers/laws-regulations-guidance/laws/index.html>

⁵⁴ Civil Rights FAQs. U.S. Department of Health and Human Services, Office for Civil Rights. <https://www.hhs.gov/civil-rights/for-individuals/faqs/index.html?language=es>

⁵⁵ Civil Rights Enforcement through Other Agencies. U.S. Department of Health and Human Services, Office for Civil Rights.

<https://www.hhs.gov/civil-rights/for-providers/compliance-enforcement/enforcement-other-agencies/index.html>

⁵⁶ Examples include but are not limited to: an individual's local police department; their institution's Title IX, Human Resources, or Equal Employment Opportunity office; the Department of Education; the EEOC; the U.S. Department of Labor's Office of Federal Contract Compliance Programs; the U.S. Department of Justice; and/or any other agencies whose funding may be implicated.

Providing clear instructions on how to report—including details on the prospective timeline for investigation and possible agency actions—can aid individuals in making the decision of whether to file a complaint. Additionally, reporting mechanisms where individuals can file an anonymous complaint may reduce fear of retaliation among trainees, students, and other award personnel.⁵⁷

Furthermore, once a report is filed with an agency and the awardee institution is informed of it, the awardee institution is expected to provide information that aids the investigation. Through external engagement, IWG-SISE learned that some awardee institutions feel that there is often a lack of specific guidance from agencies on what next steps awardees should take.

- Recommendation 2b.3: Instructions for reporting/filing a complaint should clearly describe the full agency investigative process. Details should include at a minimum: how a complaint is filed; who receives the complaint at the agency; how, where, and for how long the information is stored; potential timelines for agency notification, investigation, resolution, and monitoring; the role of the awardee institution in the investigative process; potential options for agency actions for possible report outcomes; retaliation protections; and any agency supports or policies that exist to minimize educational, training, and career disruptions to the complainant, or to support reintegration of the complainant at the awardee institution. These details should be summarized on an agency’s webpages with instructions for reporting, and additional details provided on a separate page/document easily accessible by a complainant.
- Recommendation 2b.4: Federal research agencies should establish an electronic reporting system and/or web form to file complaints, in addition to a mailing address and email address.
- Recommendation 2b.5: The electronic reporting system or webform should provide an option for complainants to remain anonymous, with the caveat that confidentiality may not be guaranteed during the investigation process and anonymity may limit the scope of the agency’s ability to evaluate and investigate a complaint.
- Recommendation 2b.6: When contacting awardee institutions to provide information in support of the complaint, agencies should make expectations clear by providing guidance to awardees with examples of necessary and sufficient information.
 - Recommendations 2a.2 and 2a.3 should also apply to the investigations that follow a complaint filed by an individual.

2c. Overview of Pathway 3: Option for Award Personnel and other Individuals to Share Information Without Filing a Complaint, and Opportunities to Improve Pathway 3 Process

Not everyone who has experienced or witnessed sex-based or sexual harassment may be interested in filing a complaint with a federal agency. They may perceive it as time-intensive, emotionally burdensome, and potentially harmful to their safety or career depending on the dynamics in their learning, working, or research environment. They may believe that their complaint may not be taken seriously or fear retaliation based on the lack of absolute anonymity. Individuals at awardee institutions should therefore have the option to anonymously share information with agencies about

discrimination, harassment, and retaliation in federally-funded programs.^{58,59,60} This option may reduce latent risks of retaliation, could be utilized by individuals who do not want to necessarily obligate themselves to further involvement in investigations, and provides situational awareness to agencies and information they may be able to connect to other complaints.

- **Recommendation 2c.1:** All federal research agencies should establish a reporting procedure, either via email or web platform, for individuals to share information about instances of harassment involving agency-funded programs and personnel that does not necessitate the filing of a complaint.
 - This reporting procedure should have an anonymous option.
 - If complaints are not anonymous, agencies should take all reasonable steps to protect confidentiality.
- **Recommendation 2c.2:** Agency responses to such reports should direct the individual to information about different options (i.e., see Recommendation 2b.2), including how to: file a complaint with the agency and what that process entails, file a complaint with the Department of Education OCR (or other agency civil rights offices), and file a complaint with the awardee institution's administrative offices.
- **Recommendation 2c.3:** Agencies should make clear what they will do with the information they receive from individuals, where and for how long that information will be stored, and how the information provided in the report may be used for compliance checks, audits, or reviews of awardee institutions.

3. Ensure Awareness Of, And Compliance With, Agency Harassment Policies and Reporting Procedures

It should be widely understood that federal reporting mechanisms are external, non-institutional pathways for reporting sex-based and sexual harassment involving award personnel, in which an individual's concerns will be taken seriously. However, during conversations with external stakeholders, it was shared that many individuals, particularly students and postdocs, are not aware of agency sex-based and sexual harassment policies and reporting procedures, nor do they know where to find this information. There are several opportunities for agencies to improve the clarity, communication, and awareness of the harassment policies and reporting procedures described in sections 1 and 2, above.

3a. Improve Clarity and Readability of Policies and Reporting Procedures

Federal research agency harassment policies can be difficult to understand and navigate for students, faculty, and administrators. These documents are often lengthy, difficult to find on an agency's website, and assume a level of legal understanding that reader may not have. In some cases, it is unclear which policies and reporting mechanisms, if any, apply to awardee institutions and award personnel, as they

⁵⁸ Harassment and Discrimination Reporting for NASA Employees, Contractors and Grantee Beneficiaries. National Aeronautics and Space Administration. <https://missionstem.nasa.gov/filing-a-complaint.html>

⁵⁹ NSF Awardee Civil Rights Compliance Program. U.S. National Science Foundation. https://www.nsf.gov/od/oecr/awardee_civil_rights/index.jsp

⁶⁰ Contact Us. Sexual Assault and Harassment Prevention and Response Program. U.S. National Science Foundation <https://new.nsf.gov/stopping-harassment/sahpr#contact-us-611>

may exist exclusively in policy and procedure documents that mostly apply to federal employees. Improving the prominence, clarity, and readability of these documents can facilitate greater understanding of the policies they contain. Agencies can further improve access to their policies by offering resources in multiple languages and in formats accessible to individuals with disabilities.

- **Recommendation 3a.1:** Federal research agency sex-based and sexual harassment policies and reporting procedures that apply to awardees and award personnel should be clearly labelled, separated from policies that pertain only to federal employees, and easy to locate on an agency's website.
 - These policies should be linked on webpages where prospective award personnel can search for funding opportunities.
- **Recommendation 3a.2:** Agencies should create infographics or other visual representations of their complaint review and investigation processes, such as a flowchart, diagram, or infographic (e.g., see the National Institutes of Health (NIH)'s visualizations).⁶¹
 - Agencies should also consider posting short, informational videos that provide a succinct overview of available reporting mechanisms. These can be disseminated through social media channels of the agency and its partner organizations (e.g., institutions of higher education; professional societies).
- **Recommendation 3a.3:** As part of agencies' language access obligations,⁶² agencies should offer copies of harassment policy and reporting procedure documents in languages other than English.⁶³
- **Recommendation 3a.4:** Agency anti-harassment policy and reporting procedure documents—and the communication of these documents—should comply with agency obligations under Section 504 and Section 508 of the Rehabilitation Act.⁶⁴
 - Agencies should provide 508-compliant document and website formats and engage in practices that facilitate effective communication with individuals with disabilities.

3b. Frequently Share Information About Agency Policies and Reporting Procedures with Award Personnel

Agencies should ensure that information regarding sex-based and sexual harassment policies and reporting procedures are readily available to students, postdocs, and other researchers through early and ongoing educational efforts. While researchers annually participate in trainings about what harassment is and how to avoid making workplaces unwelcoming, they also need to be informed about policies around reporting and how to disseminate this information to all award personnel. These policies should be provided to research personnel by the agency, awardee institution, and PI early and often throughout the federally-funded project.

⁶¹ NIH Process for Handling Allegations of Harassment on an NIH-Funded Project at a Recipient Institution. U.S. National Institutes of Health. <https://grants.nih.gov/grants/policy/harassment/actions-oversight/allegation-process.htm>

⁶² Language Access Plans. LEP.gov. <https://www.lep.gov/language-access-plans>

⁶³ Federal financial assistance announcements, applications, and Federal award information must be in terms of U.S. dollars. However, agencies, recipients, and subrecipients may issue or translate a federal award or other documents into another language. [2 CFR 200.111\(a\)](#)

⁶⁴ What is section 504 and how does it relate to Section 508? U.S. Department of Health and Human Services. <https://www.hhs.gov/web/section-508/what-is-section-504/index.html>

Making harassment policies and reporting procedures highly visible signals that preventing and responding to harassment is a priority of the funding agency and awardee institution. Increasing awareness of policies will also inform personnel of their rights and responsibilities if they experience or witness harassment or discrimination, which may be information that is hard to access if you are a student/researcher early in your career or if you are an international student/researcher.

- **Recommendation 3b.1:** Federal research agencies should require awardees to provide information to all award personnel about federal research agency discrimination/harassment policies and complaint reporting procedures at the onset of the award period:
 - Agencies should require a notice be given to each person supported by an award that explains what the civil rights laws require, what constitutes discrimination, and where to go to report allegations of harassment.
 - Agencies may consider including information about alternate reporting mechanisms (i.e., see Recommendation 2b.2).
 - Compliance with the distribution of information could be periodically reviewed by agencies during audits or compliance reviews.
- **Recommendation 3b.2:** A poster (e.g., U.S. Department of Energy (DOE)⁶⁵ or U.S. Equal Employment Opportunity Commission (EEOC)⁶⁶ posters) or brochure (e.g., Ship Operations Cooperative Program brochures)⁶⁷ containing information provided in the notice proposed in Recommendation 3b.1 should also be posted/provided in physical (research lab, PI office, graduate student and postdoc office areas, restroom stalls) and virtual places (PI's research lab website) frequently used by the personnel participating in the award or activity.

3c. Provide Training and Technical Assistance

Reporting harassment of all kinds can be a complicated process in academic environments. While one office may take the report, another may be in charge of investigating, and yet still other offices handle the disciplinary action and reporting to federal agencies, if required. Turnover in administrative personnel may also open gaps in institutional knowledge of federal regulations and reporting procedures. For awardees that receive awards from multiple federal agencies, inconsistency between federal research agency policies can add to confusion about what needs to be reported and when. Limited staffing resources at historically underfunded institutions, such as Historically Black Colleges and Universities, Tribal Colleges and Universities, and other minority-serving institutions, can further compound an institution's ability to be aware of and comply with federal reporting procedures.⁶⁸

Encouraging consistent information sharing between agencies and institutions is key for success, but this also needs to extend to individuals working day-to-day on activities funded by the federal award. Currently available modules on sex-based and sexual harassment and reporting are focused at the institutional level and rarely contain information about reporting to agencies. In addition to verifying

⁶⁵ Know Your Rights. U.S. Department of Energy. <https://www.energy.gov/sites/default/files/2020/03/f72/know-your-rights-poster-updated.jpg>

⁶⁶ "Know Your Rights: Workplace Discrimination is Illegal" Poster. U.S. Equal Employment Opportunity Commission. <https://www.eeoc.gov/poster>

⁶⁷ SASH Prevention Materials. Ship Operations Cooperative Program Sexual Assault and Sexual Harassment Prevention. <https://www.socp.us/sash-prevention>

⁶⁸ Advancing Research Capacity at High Research Activity Historically Black Colleges and Universities. 2024. National Science and Technology Council. <https://www.whitehouse.gov/wp-content/uploads/2024/05/CoSTEM-HBCU-Report.pdf>

that award personnel are aware of agency policies and reporting procedures, agencies can provide in-person or virtual trainings for awardees and award personnel.

- **Recommendation 3c.1:** Federal research agencies should develop training and technical assistance resources regarding harassment policies, civil rights compliance, and agency reporting procedures for awardee staff—including senior leadership (e.g., Provosts and Deans), grants management administrators, Title IX coordinators, Equal Employment Opportunity offices, and/or Human Resources (HR) staff, general counsel—and all award personnel. These trainings should include details on how to report harassment to federal agencies and what the requirements are for harassment investigations to occur.

3d. Engage in Proactive Compliance

While growing awareness and understanding of federal policies and procedures among awardee institutions and award personnel, agencies should also engage in proactive compliance practices. Federal research agency policies and procedures can only be effective in reducing sex-based and sexual harassment among award personnel if awardee institutions are compliant. There may be multiple cognizant offices within a federal agency that are responsible for promoting institutional compliance with sex-based and sexual harassment policies that an awardee agrees to upon accepting a federal research and development award. These offices should develop clear processes for communicating information about awardees with each other and procedures for reviewing institutional compliance.

- **Recommendation 3d.1:** Federal research agencies should determine how to examine awardee compliance with sex-based and sexual harassment policies and reporting procedures that institutions accept as a condition of receiving federal research and development awards.
 - Agencies should ramp up tools at their disposal (e.g., annual compliance checks, desk audits, culture audits,⁶⁹ site visits, etc.) to ensure awardee compliance
- **Recommendation 3d.2:** Agencies could tailor training and technical assistance offerings, as described in Recommendation 3c.1, to improve policy and procedure uptake/adherence among awardee institutions who are found to have issues with compliance.
- **Recommendation 3d.3:** Agencies should outline potential disciplinary measures that will be taken against awardee institutions that are found to be noncompliant with sex-based and sexual harassment policies that institutions accept as a condition of receiving federal research and development awards.

3e. Improve Internal Communication of Agency Policies

In addition to improving public awareness of policies, procedures and resources, agencies should work to ensure their agency staff are aware of their harassment policies and reporting procedures. Since agency program officers or managers (those managing sponsored research portfolios) are often the primary points of contact for an award's PI and key personnel, they may be the first in the agency to receive information from award personnel about a sex-based or sexual harassment issue in agency-funded programs, projects, or institutions. It is critical that federal personnel be aware of the agency's

⁶⁹ U.S. Merchant Marine Academy Culture Audit. 2016. U.S. Department of Transportation.
<https://www.maritime.dot.gov/sites/marad.dot.gov/files/docs/foia/3971/201612-usmma-culture-audit-final-report.pdf>

official reporting procedures and to whom/to which office they need to share such information, ensuring they are sharing information with only those individuals with a need to know, and also are able to direct award personnel to the appropriate reporting mechanisms.

- **Recommendation 3e.1:** Agencies should send an annual internal memo or bulletin (e.g., NSF bulletin)⁷⁰ to all employees that includes links to the agency’s harassment policies and reporting procedures for harassment that occurs involving award personnel.
 - Such a memo/bulletin should include instructions on what the federal employee should do and who they should contact in the event they become aware of a harassment issue in an agency-funded program, project, or institution.
 - Employees should also be directed to: provide contact information for the agency office that handles complaints of harassment to the person(s) that reported the information, consider all information received as confidential, and only share the information with the appropriate agency officials for reporting purposes and those who have a need to know.

- **Recommendation 3e.2:** Agencies should require that all employees complete an annual training module that provides details on harassment policies and reporting procedures for harassment that occurs involving award personnel; it should remind employees about what to do and who to contact in the event they become aware of harassment in an agency-funded program, project, or institution.

4. Increase Data Transparency and Accountability to Support Evidence-Based Policy Improvements

Transparency is essential to building a culture that condemns inappropriate behavior and encourages safe and inclusive working environments for everyone involved with STEM research.⁷¹ Agencies have the opportunity to: increase transparency about the reports they receive from awardees and how they respond to those reports; conduct iterative policy evaluation and development; and develop agency-wide strategic plans for reducing sex-based and sexual harassment in federally-funded STEM environments.

4a. Transparency About Reports Received and Agency Actions Taken

As agencies expand their policies designed to prevent and respond to reports of sex-based and sexual harassment, they should be clear in how they are handling these reports and what actions follow. Greater transparency with available data on reporting, outcomes, and consequences of harassment complaints could encourage individuals to report harassment. It would also demonstrate to potential harassers and the research community at large that there are consequences to their actions and that sex-based and sexual harassment are not tolerated by federal research agencies.

⁷⁰ OECR Bulletin No. 23-02, Sexual Harassment Reporting. U.S. National Science Foundation, Office of Equity and Civil Rights. <https://www.nsf.gov/od/oecr/docs/oecr2302.pdf>

⁷¹ Best Practices for Reducing Organizational, Cultural, and Institutional Barriers in STEM Research. 2024. National Science and Technology Council. <https://www.whitehouse.gov/wp-content/uploads/2024/05/CoSTEM-IWGIS-Barriers-Report.pdf>

For example, NSF currently provides data regarding the number and type of notifications it receives as part of its mandatory institutional reporting under its term and condition (pathway 1, above).⁷² The data is separated by fiscal year and begins with fiscal year 2019. The data identifies the total number of notifications reported to NSF by awardee institutions each fiscal year and whether it was a finding/determination for an administrative action reported by the awardee. This chart does not detail any follow-up actions that may have been taken by NSF after receiving the reports. No data is provided on complaints filed through NSF's awardee civil rights compliance program (pathway 2, above).

As another example, NIH currently provides data that summarizes the allegations received by the Office of Extramural Research.⁷³ The data combines results from January 1, 2018 through May 15, 2024. The data provides the total number (and percent) of sexual harassment or gender discrimination allegations and the total number (and percent) of other allegations, distributed across eight possible findings/outcomes. Other allegations include, but are not limited to, harassment, bullying, and discrimination based on race and national origin. NIH decided to combine data for these other allegations “due to the frequent overlap of types of allegations in a single case and the concern about small numbers and privacy.”⁷⁴ The eight categories of findings/outcomes include: contact with institution, formal investigation, allegation substantiated, institutional safeguards, PI removed, other grants actions, left institution, and removed from peer review.

- **Recommendation 4a.1:** All federal research agencies should publicly release statistics on the reports of sexual and other types of harassment/discrimination they've received. Agencies should:
 - Include information from both mandatory institutional reports (pathway 1) and from complaints by individuals (pathway 2).
 - Consider disaggregating data by institution type or geographic region if it does not jeopardize the anonymity of complainants or affected individuals.
 - Include information on agency actions taken, not just what was included by the awardee/individual in the report to the funding agency.

4b. Iterative Policy Evaluation and Improvement

While releasing the information suggested above will shed light on how many reports have been made to agencies, the suite of agency actions, and what the outcomes were, more data is also needed to determine the effectiveness of agency response to sex-based and sexual harassment. Such data can be used to identify patterns of behavior across research environments, note areas for improvement in how sex-based and sexual harassment is handled, managed, and mismanaged, and inform the iterative improvement of agency actions. Furthermore, releasing information on where and how agency actions have worked, including case examples of successful use of policies (similar to agency Title IX compliance review reports, e.g., report from DOE)⁷⁵ can demonstrate to awardees where they can align their own policies to maximize impact.

⁷² Term and Condition: Sexual Harassment, Other Forms of Harassment, or Sexual Assault. U.S. National Science Foundation, Office of Equity and Civil Rights. https://www.nsf.gov/od/oecr/awardee_civil_rights/term_and_condition.jsp

⁷³ Data - Harassment and Discrimination Concerns. National Institutes of Health. <https://grants.nih.gov/grants/policy/harassment/data>

⁷⁴ Data - Harassment and Discrimination Concerns. National Institutes of Health. <https://grants.nih.gov/grants/policy/harassment/data>

⁷⁵ Title IX Promising Practices. 2020. U.S. Department of Energy. <https://www.energy.gov/justice/articles/title-ix-promising-practices>

- **Recommendation 4b.1:** Federal research agencies should conduct data collection and evaluations to determine which policies, procedures, and agency actions have been effective at changing institutional reporting rates and/or reducing incidence rates of sex-based and sexual harassment involving award personnel. Data collection and evaluations should happen within individual agencies and collectively among agencies, as institutions are funded by multiple agencies, and reduction in harassment at the awardee institutions could be attributed to the actions of more than one agency. Agencies should:
 - Provide examples of successful use cases.
 - Release data, evaluations, and case examples to the public.
 - Conduct analysis with multiple metrics of harassment reduction in mind, including but not limited to: number of individual reports received, number of proactive awardee reports, knowledge of reporting mechanisms by award personnel, and suitability of follow up actions taken by awardee institutions.
 - Share results of policy effectiveness with other agencies to generate best practices as part of communities of practice, working groups, or other interagency coordination bodies.

As part of determining policy effectiveness, agencies should therefore conduct regular reviews of their policies and then routinely amend these policies for improvement, if needed. For example, the NSF United States Antarctic Program (USAP) Alcohol Policy was released in 2013, amended in 2016 to include field camps and vessels, reviewed and updated in 2022, with a final amendment added in 2023 regarding alcohol resale and transportation.⁷⁶

- **Recommendation 4b.2:** All federal research agencies should review effectiveness of their sex-based and sexual harassment prevention and response policies that pertain to award personnel in regular intervals (e.g., every three to five years). These policies should include a brief summary of changes/amendments made since its inception and their effects.

4c. Leverage Award Closeout and Existing Survey Instruments to Collect Data on Sex-Based and Sexual Harassment

Agencies can also leverage post-award management processes to collect information on experiences with sex-based and sexual harassment from award personnel they fund in order to inform evaluation and monitoring efforts. Exit surveys at the close of an award can provide avenues for students, postdocs, and other personnel to share information about their research and training experience, including any concerns about sex-based and sexual harassment or larger issues regarding institutional climate which could allow for harassment. Close out could provide another opportunity to direct these individuals to where they can report misconduct.

- **Recommendation 4c.1:** Federal research agencies should consider dispersing brief exit surveys to award personnel, including supported trainees, upon the closure of an award. Surveys should include questions about whether PIs fulfilled actions outlined in mentoring plans, whether students, postdocs, or trainees had a positive experience with their training and research experience, and whether they felt they were in an environment free from sex-based and sexual

⁷⁶ USAP Alcohol Policy. U.S. National Science Foundation. <https://www.nsf.gov/geo/opp/documents/policy/usap-alcohol-policy.pdf>

harassment. Given that this information will be requested at the end of the award and/or project, these individuals may feel empowered to honestly share their experiences.

- Exit surveys could be part of the award closeout for all types of research training and career development awards (i.e., awards that support trainees, such as graduate research fellowship or postdoctoral research fellowship awards).
- The survey results should not be accessible to the PI.
- Surveys should direct the respondent to appropriate agency webpages, platforms, and email addresses where respondents can disclose information about harassment, discrimination, and/or bullying that occurred as part of the funded program or award activities (i.e., see Recommendation 2b.2).

In addition to exit surveys at the close of an award, agencies could utilize existing survey instruments to gather information about harassment occurring at awardee institutions. For example, the National Center for Science and Engineering Statistics conducts the Survey of Earned Doctorates each year.⁷⁷ This survey collects information on doctoral recipients' demographic characteristics, educational history, and plans after receiving their degree. Questions could be added to such surveys to better understand where harassment is occurring across institutions of higher education, and how it impacts the postgraduation plans of early career researchers.

- Recommendation 4c.2: Agencies responsible for such surveys should consider adding questions to collect information from individuals about if and how sex-based and sexual harassment have impacted their career in STEM.
 - Agencies should have a plan of what they will do with this information and how they will respond to allegations of harassment or other misconduct.

4d. Agency-wide Strategic Planning

Agencies should be held accountable for expanding/improving their sex-based and sexual harassment policies and how these policies impact the federally-funded research community. To build mechanisms for accountability, agencies can develop strategic plans that track policy changes and impact.

- Recommendation 4d.1: Through additions to their current strategic plans, or in future strategic plans, federal research agencies should consider setting goals, with measurable and trackable benchmarks for success, aimed at reducing sex-based and sexual harassment across federally-funded research programs.
 - Agencies should publicly release such plans and publish annual updates toward progress.

5. Prevent Sexual Harassment in Federally-Funded Off-Site Locations

In order to prevent and reduce sex-based and sexual harassment in off-site locations, such as field sites or conferences, or through technology-facilitated means, agencies can require awardees to develop site-specific harassment policies, codes of conduct, or safety plans.

⁷⁷ Survey of Earned Doctorates. U.S. National Science Foundation. <https://nces.nsf.gov/surveys/earned-doctorates/2022>

5a. Off-campus or Field Research Sites or Technology-Facilitated Interactions

Research^{78,79,80} has revealed that harassment is pervasive online and at off-site locations across numerous disciplines, particularly when these sites are in relatively remote areas and when policies and standards of behavior for field research lack clarity. Online harassment and abuse are increasingly widespread in today's digitally connected world. This can include online threats and intimidation as well as various forms of technology-facilitated gender-based violence, such as the non-consensual distribution of intimate images, cyberstalking, and sextortion.⁸¹ Off-site locations in remote areas can often lack clear policies and standards of behavior for field research.⁸² Given this pervasiveness, federal research agencies often have additional policies and reporting procedures designed to address harassment at off-site locations,⁸³ including field sites^{84,85,86,87} and vessels at sea.^{88,89}

NSF has comprehensive policies in place to foster harassment-free environments at off-campus and field site locations. In 2022, a team comprising members of the NSF Office of the Director and Office of Equity and Civil Rights and the Office of the Inspector General visited Antarctica to manage the installation of a SAHPR support office.⁹⁰ This office provides immediate resources for people who have experienced sexual assault and harassment while deployed in Antarctica. The NSF Director also established a Task Force on harassment in the United States Antarctic Program to coordinate the implementation of NSF actions. Broadly, when proposers seek NSF funding for off-campus or off-site research, including vessel and aircraft research, the AOR must certify that there is a plan in place to

⁷⁸ Clancy, et al. 2014. Survey of Academic Field Experiences (SAFE): Trainees Report Harassment and Assault. PLOS One. <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0102172>

⁷⁹ Meyers, et al. 2018. The Context and Consequences of Sexual Harassment in Southeastern Archaeology. *Advances in Archaeological Practice*. <https://www.cambridge.org/core/journals/advances-in-archaeological-practice/article/abs/context-and-consequences-of-sexual-harassment-in-southeastern-archaeology/9FF373F0E76DAC09419F6B57C8616327>

⁸⁰ Mattheis, et al. 2022. "Maybe this is just not the place for me:" Gender harassment and discrimination in the geosciences. PLOS One. <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0268562>

⁸¹ <https://www.whitehouse.gov/briefing-room/statements-releases/2023/03/03/executive-summary-initial-blueprint-for-the-white-house-task-force-to-address-online-harassment-and-abuse/>

⁸² Nelson, et al. 2017. Signaling Safety: Characterizing Fieldwork Experiences and Their Implications for Career Trajectories. *American Anthropologist*. <https://anthrosource.onlinelibrary.wiley.com/doi/10.1111/aman.12929>

⁸³ Interagency Working Group on Safe and Inclusive STEM Environments Inventory. 2024. National Science and Technology Council. <https://www.whitehouse.gov/wp-content/uploads/2024/02/Interagency-Working-Group-on-Safe-and-Inclusive-STEM-Environments-Inventory-2024.pdf>

⁸⁴ Polar Code of Conduct. U.S. National Science Foundation, Office of Polar Programs. https://www.nsf.gov/geo/opp/documents/policy/polar_coc.pdf

⁸⁵ NSF Antarctic Helpline. U.S. National Science Foundation. <https://nsfantarctichelpline.org/>

⁸⁶ Proposal & Award Policies & Procedures Guide (PAPPG) (NSF 24-1), Chapter II: Proposal Preparation Instructions, Safe and Inclusive Working Environments for Off-Campus or Off-Site Research. U.S. National Science Foundation. <https://new.nsf.gov/policies/pappg/24-1/ch-2-proposal-preparation#ch2E9>

⁸⁷ NSF23-071: Frequently Asked Questions (FAQs) Regarding Preparation and Submission of Safe and Inclusive Fieldwork (SAIF) Plans under the BIO/GEO Pilot. 2023. U.S. National Science Foundation. <https://www.nsf.gov/pubs/2023/nsf23071/nsf23071.jsp?org=OPP>

⁸⁸ Every Mariner Builds A Respectful Culture (EMBARC) Standards. U.S. Department of Transportation, Maritime Administration. <https://www.maritime.dot.gov/education/every-mariner-builds-respectful-culture-embarc-standards>

⁸⁹ NAO 202-1106: NOAA Sexual Assault and Sexual Harassment Prevention and Response Policy. 2018. U.S. Department of Commerce, National Oceanic Atmospheric Administration. <https://www.noaa.gov/organization/administration/nao-202-1106-noaa-sexual-assault-and-sexual-harassment-prevention-and>

⁹⁰ NSF Actions in Response to Sexual Assault/Harassment Prevention Issues in the United States Antarctic Program (USAP). 2022. U.S. National Science Foundation. <https://www.nsf.gov/od/oecr/docs/nsf-actions-to-prevent-sexual-assault-and-harassment.pdf>

GUIDELINES FOR FEDERAL RESEARCH AGENCIES TO REDUCE SEX-BASED AND SEXUAL HARASSMENT INVOLVING AWARD PERSONNEL

address harassment, bullying, stalking, and other kinds of offensive or unwelcome conduct, including a procedure for making incident reports. Plans must be shared with all individuals participating in the off-site activity prior to departure.

- Recommendation 5a.1: Agencies should provide frequent opportunities for students, postdocs, researchers, and other personnel affiliated with federally-funded off-site and field locations to provide feedback on the effectiveness of sex-based and sexual harassment policies and reporting procedures.
 - If possible, an opportunity for providing anonymous feedback should be included.
- Recommendation 5a.2: All federal research agencies that fund off-site research should require awardee institutions to have in place a plan/policy/code of conduct for creating physically safe and psychologically safe environments, establishing clear protocols for project personnel to take should they fear being at risk of harassment (e.g., unfettered access to a phone with GPS capabilities in remote locations), and clear protocols for immediately addressing harassment and other kinds of misconduct before it rises to the level of illegal harassment specifically at that off-site location. At minimum, plans should:
 - Not conflict with the awardee institutions' obligations under Title IX and other nondiscrimination statutes.
 - Include descriptions of how the institution aims to cultivate an inclusive and harassment-free environment and clearly detail processes for reporting, responding to, and resolving incidents, including details on how the awardee institution will direct impacted individuals to necessary resources (such as advocacy resources and medical exams).
 - Detail what kinds of prevention training (strategic resistance, bystander intervention, and/or workplace culture, etc.) the awardee institution will provide for off-site research participants.
 - Provide participants in the off-site research activity with information on how to file discrimination and harassment complaints with the funding agency or with other agencies/entities (i.e., see Recommendation 2b.2).
 - Specifically address online and technology-facilitated harassment and abuse.
 - Be read and signed by all participants, and awardees should keep a record of this documentation.
- Recommendation 5a.3: Federal research agencies should provide technical assistance for prospective awardees to prepare such plans, including FAQ documents, a list of considerations for developing the plan, relevant peer-reviewed research and best practices, recordings of webinars and workshops, blogs, podcasts, and videos.
 - Agencies should also consider posting examples of promising policies on their websites.
- Recommendation 5a.4: If requiring a plan for safe and inclusive off-site research environments, agencies should consider allowing perspective award personnel to request funds for additional staff support or project funding to carry out the stated strategies, goals, and activities of the plan.
- Recommendation 5a.5: Agencies could pilot the inclusion of off-site and field site harassment policies, codes of conduct, and other related plans as part of the merit review process, if they have the authority to conduct merit review of proposal components beyond scientific criteria.

5b. Conferences and Professional Meetings that are Supported by Federal Funds

Sex-based and sexual harassment can occur at conferences and off-campus meetings, including through online and technology-facilitated means.^{91,92} As such, federal research agencies may have policies designed to foster harassment-free environments at agency-sponsored conferences.^{93,94,95,96}

NSF's harassment policy for conferences is similar to its policy for off-campus or off-site research. Conference proposals must indicate that there is a policy or code of conduct in place to address harassment, including processes for complaint reporting and resolution. The policy should be shared with participants prior to the conference, should be made available at the conference itself, and does not need to be submitted to NSF for review. Prospective award personnel seeking conference funding from the DOE Office of Science must also have a policy or code of conduct for addressing, reporting, and resolving complaints of harassment that is shared with participants in advance of the event. Funding provided by NIH Support for Scientific Conferences (R13 and U13) requires a conference plan and diversity plan upon application and a safety plan once the proposal is recommended for funding. When NIH conference proposals are recommended for funding, proposers must provide a safety plan that includes: a commitment to providing a safe environment; behavioral expectations and a list of behaviors considered harassing; instructions on how to confidentially report harassment to the conference organizers and information on how the organizers will handle these reports; and information on how to contact and file a report with the Department of Health and Human Services Office for Civil Rights, as well as NIH.

- Recommendation 5b.1: All federal research agencies that fund conferences, meetings, workshops, and other convenings should require awardee institutions to develop a plan for addressing sex-based and sexual harassment and other kinds of misconduct specifically for that event, including through online and technology-facilitated means. Plans should include descriptions of how the organizers aim to cultivate an inclusive and harassment-free environment and clearly detail processes for reporting, responding to, and resolving incidents. Plans should be read and signed by all participants (including attendees, presenters, and speakers) and organizers should keep a record of this documentation.
 - Plans should also provide participants with information on how to file discrimination and harassment complaints with the agency (or agencies, in cases where a convening that has support from multiple agencies) that provides funding for the event.
 - A link to this plan and/or a timeline of plan development should be provided to the agency.

⁹¹ Archer E and Hahn B. 2019. The Women's Professional Conference Experience & Impact Study. Center for the Advancement of Women, Mount Saint Mary's University, and Brady Hahn Consulting & Insight Collective. <https://www.theconferencestudy.com/>

⁹² Heaton, et al. 2020. Survey of Dental Researchers' Perceptions of Sexual Harassment at AADR Conferences: 2015 to 2018. Journal of Dental Research. <https://journals.sagepub.com/doi/abs/10.1177/0022034520908504?journalCode=jdrb>

⁹³ Interagency Working Group on Safe and Inclusive STEM Environments Inventory. 2024. National Science and Technology Council. <https://www.whitehouse.gov/wp-content/uploads/2024/02/Interagency-Working-Group-on-Safe-and-Inclusive-STEM-Environments-Inventory-2024.pdf>

⁹⁴ Proposal & Award Policies & Procedures Guide (PAPPG) (NSF 24-1), Chapter II: Proposal Preparation Instructions, Conference Proposal. <https://new.nsf.gov/policies/pappg/24-1/ch-2-proposal-preparation#ch2F8>

⁹⁵ Conference Proposals. U.S. Department of Energy, Office of Science. <https://science.osti.gov/grants/Applicant-and-Awardee-Resources/Conference-Proposals>

⁹⁶ NIH Support for Scientific Conferences (R13 and U13). U.S. National Institutes of Health. <https://grants.nih.gov/grants/funding/r13/index.htm>

- Recommendation 5b.2: Agencies should require conference proposals to describe plans for evaluating efforts to cultivate an inclusive environment post-conference.
- Recommendation 5b.3: Federal research agencies should provide technical assistance for prospective awardees to prepare such plans, which may include offering FAQ documents, a list of topics to consider in the development of the plan, and links to relevant peer-reviewed research and best practices.
 - Agencies should also post examples of promising plans on their websites.

6. Support Innovative Approaches for Reducing Harassment in STEM Environments

Agencies have the opportunity to improve STEM research culture at awardee institutions through innovative proposal requirements, program offerings, and funding supplements designed to cultivate more equitable and inclusive environments that support the needs of investigators, postdocs, and students. The incidence of sex-based and sexual harassment could be impacted through this broader shift in culture, as it would create an environment where reporting is encouraged, harassing behaviors are discouraged and dealt with immediately, and researchers from all backgrounds would be supported and retained throughout their careers.

6a. Improve Research Environments by Requiring Award Proposals to Include Plans for Safe, Inclusive, and Equitable Research

To reflect agency commitments to supporting STEM environments where individuals of all backgrounds are able to thrive, two federal research agencies now require some grant proposals to include plans for safe, inclusive, and/or equitable research.^{97,98} Such plans require investigators to think critically about the expertise and composition of their research team, the culture of their lab and institution, their roles and responsibilities as a team leader and mentor, and they are encouraged to include the input of experts. Therefore, these plans could prove effective for creating research environments that are intolerant of sex-based and sexual harassment.

Proposals to DOE Funding Opportunity Announcements and National Lab Announcements are required to submit a Promoting Inclusive and Equitable Research (PIER) Plan. Reviewers are instructed to evaluate the quality and efficacy of the PIER Plan based on what is proposed, which may include efforts to establish and cultivate research environments that promote mutual respect and professionalism and productivity and where project personnel feel welcome, safe, supported, and encouraged to make technical contributions to the project. This also evaluating the quality and efficacy of plans that implement activities within the research project that support scholarly and professional growth of project personnel.

⁹⁷ Promoting Inclusive and Equitable Research (PIER) Plans. U.S. Department of Energy, Office of Science.
<https://science.osti.gov/grants/Applicant-and-Awardee-Resources/PIER-Plans>

⁹⁸ Research Opportunities in Space and Earth Sciences – 2024 (ROSES-2024). National Aeronautics and Space Administration, Headquarters, Science Mission Directorate.
<https://nspires.nasaprs.com/external/viewrepositorydocument/cmdocumentid=983947/solicitationId=%7b600EE5E5-E9D5-FF55-0CAD-764F6D4BEEA9%7d/>

Similarly, applications to some of NASA’s Research Opportunities in Space and Earth Sciences (ROSES) program elements must include a two-page Inclusion Plan, as part of the Inclusion Plan pilot program. Inclusion Plans are assessed on the extent to which the goals will create and sustain a positive and inclusive working environment, how the plan demonstrates awardees of systemic barriers to creating inclusive environments, the appropriateness of the plan activities for equipping team members to build and maintain inclusive environments, the description and justification of personnel roles and responsibilities, reasonableness of the propose timeline, whether the assessment plan for proposed activities is appropriate, and the reasonableness of the resources requested to carry out the plan.^{99,100}

- Recommendation 6a.1: All federal research agencies should consider piloting requirements for perspective award personnel to submit plans for cultivating safe, inclusive, and equitable research environments. Agencies should clearly outline the information that should be included in such a plan, including metrics which will be used to determine the effectiveness of the proposed plan. Plans should be specific to the research environment, i.e., laboratory, instead of referencing the awardee institution as a whole, and sections of this plan should be devoted to mentorship and career development if students, postdocs, and early-career investigators are included in the award. Additionally, PIs should include steps they will take to personally grow and develop as leaders, including how they will ensure knowledge of policies and best practices regarding sex-based and sexual harassment.
- Recommendation 6a.2: Federal research agencies should provide technical assistance for prospective awardees to prepare such plans, including FAQ documents, a list of considerations for developing the plan, relevant peer-reviewed research and best practices, recordings of webinars and workshops, blogs, podcasts, and videos.
 - Agencies should also consider posting examples of promising plans on their websites.
- Recommendation 6a.3: If requiring a plan for cultivating safe, inclusive, and equitable research environments, agencies should allow perspective award personnel to request funds for additional staff support or project funding to carry out the stated strategies, goals, and activities of the plan. Cost should be justified in the plan and clearly identified in the proposal budget.
- Recommendation 6a.4: Agencies could pilot the review of such plans in a process separate from scientific merit review.
- Recommendation 6a.5: Agencies should provide clear guidance on how adherence to these plans will be evaluated, including the expectation for progress to be documented in progress reports and final grant summaries.
- Recommendation 6a.6: Within three years of piloting these plans, agencies should evaluate the effectiveness of such plans to consider how best to cultivate inclusive environments; support all staff, including award personnel from underrepresented groups; support the professional

⁹⁹ Inclusion Plan Resources. National Aeronautics and Space Administration, Science Mission Directorate.

<https://science.nasa.gov/researchers/inclusion>

¹⁰⁰ Inclusion Plan Best Practices Workshop. 2022. Universities Space Research Association, Lunar and Planetary Institute. [Inclusion Plan Best Practices Workshop \(usra.edu\)](https://www.usra.edu/inclusion-plan-workshop)

development of trainees; and/or prevent and reduce discrimination, harassment, and bullying pursuant to applicable law.

- Agencies should share results of plan effectiveness with other agencies as part of communities of practice, working groups, or other interagency coordination bodies. Results of plan effectiveness should also be shared with awardees and the public.

6b. Address Power Dynamics and Funding Structures in STEM

Research has shown that sexual and sex-based harassment frequently arise from the power imbalances that exist in the academic environment.¹⁰¹ The structure of research and mentoring in STEM fields means that PIs and other award personnel can spend a lot of time alone together, in labs and classrooms, and at field sites, research stations, and conferences. In many cases, funding for a graduate assistantship or postdoctoral fellowship is tied to a PI's research award funding. If a PI loses their funding, the trainee may lose theirs as well, which can be particularly detrimental to the careers of students and postdocs, particularly international students and postdocs whose visa status is tied to their position/employment. As letters of recommendation from the primary supervisor are typically required for career advancement, harassment within an advisor-advisee relationship can be extremely disruptive for students and early career researchers, especially in areas of research with relatively few investigators. Given such power dynamics, students, postdocs, and other individuals must therefore consider the very real possibility of retaliation by the harasser, and the loss of their position or job, if they decide to file a complaint.¹⁰²

Funding models that diffuse the hierarchical and dependent relationship between students, postdocs, and faculty can therefore prevent and reduce harassment. Mechanisms should be put in place for students and researchers to easily switch labs or advisors, without interruption in scientific productivity or funding, and they should be allowed to explain lapses in their training if they do occur. Agencies can provide critical resources that support efforts to reintegrate and retain individuals who have experienced sex-based and sexual harassment.¹⁰³

Furthermore, funding for graduate students, postdocs, and other trainees should allow for paid absences during the award period in the event the trainee has reported experiencing sex-based and sexual harassment or discrimination. This would allow for separation from the hostile environment, time to address emotional and mental health needs, and to deal with other needs that may arise. Across federal opportunities, leave policies vary and often require approval from both the funding agency and awardee institutions.

- Recommendation 6b.1: Agencies should explore mechanisms for decoupling trainee funding from PI funding on a research award, such that if the funding for the PI or project is terminated,

¹⁰¹ Preventing Sexual Harassment and Reducing Harm by Addressing Abuses of Power in Higher Education Institutions. 2023. Remediation Working Group of the Action Collaborative on Preventing Sexual Harassment in Higher Education. National Academies of Sciences, Engineering, and Medicine. <https://www.nationalacademies.org/news/2023/02/preventing-sexual-harassment-and-reducing-harm-by-addressing-abuses-of-power-in-higher-education-institutions>

¹⁰² Mattheis, et al. 2022. "Maybe this is just not the place for me:" Gender harassment and discrimination in the geosciences. PLOS One. <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0268562>

¹⁰³ Research Supplements to Promote Reentry and Reintegration into Health Related Research Careers. U.S. National Institutes of Health, Office of Research on Women's Health. <https://orwh.od.nih.gov/career-development-education/research-supplements-promote-reentry-and-reintegration-health-related>

trainees would not lose their funding. This may be accomplished through policies that more easily allow trainees to transfer funding to another PI at the awardee institution.

- Recommendation 6b.2: Federal research agencies should increase the number of funding opportunities in which graduate students and postdocs themselves receive funding independent of a PI or are otherwise not impeded by changes in funding of faculty members/senior award personnel. In the event of harassment, discrimination, or other abuse and misconduct, agencies should assist with transfer of these awards such that trainees are able to work with another mentor/institution.
- Recommendation 6b.3: Federal research agencies should offer administrative supplements to promote reintegration and short-term support for all award personnel who experience harassment, including graduate students, postdocs, and other early career researchers.
- Recommendation 6b.4: Agencies should expand/revise existing policies regarding leave within fellowships and other programs to allow for paid leaves of absence, which may be utilized by individuals who have experienced harassment.

Lastly, good mentorship of trainees requires an investment of time and resources that may detract from what is seen as the typical measures of scientific productivity including papers, presentations, and grants. However, this commitment to training, mentorship, and inclusivity is imperative for the maintenance of a productive, creative STEM ecosystem free from sex-based and sexual harassment. Therefore, federal agencies should encourage investment in investigators who not only contribute to scientific knowledge but also invest in building a sustainable, capable STEM workforce, including by acting as a resource for students, postdocs, or trainees who may experience sex-based and sexual harassment.

- Recommendation 6b.5: Federal research agencies that support students and postdocs should encourage the identification of mentoring teams rather than a single advisor and require the creation of mentorship plans and/or mentor-mentee contracts that identify expectations of behaviors and mentoring at the beginning of an award.
- Recommendation 6b.6: Federal research agencies should consider mechanisms to reward principal investigators for excellent mentorship, the creation of inclusive STEM environments, and other service activities that contribute to the success of the research environment.

7. Provide Funding Opportunities for Sex-Based and Sexual Harassment Research, Evaluation, and Training

Federal research agencies' commitment to transforming the culture of STEM environments should extend to program priorities, consistent with their scientific mission. Awardees may face challenges in complying with expanded federal research agency harassment policies—and existing federal and state requirements—without additional support. Prioritizing program funding in support of research, evaluation, and training support could particularly benefit emerging research institutions, as the research culture at their institution rapidly evolves as a result of receiving more federal awards.

7a. Offer Funding for Awardees to Generate Evidence and Inform Best Practices

Federal agency funding can support research and development in best practices for sex-based and sexual harassment prevention, reduction, and response.^{104, 105, 106} As institutions work to evaluate their organizational climates and determine avenues for instituting evidence-based policies, federal agencies can provide support for climate surveys and other assessments. Agencies also have the opportunity to fund partnerships for awardees to share resources and best practices.

- **Recommendation 7a.1:** Federal research agencies should develop dear colleague letters, funding programs, and other opportunities that fund research on effectiveness of sex-based and sexual harassment policies and interventions, including best practices for prevention, reduction, and response.
- **Recommendation 7a.2:** Federal research agencies should develop funding opportunities for implementation projects that are designed to facilitate institutional cultural change, change organizational policies, and develop resources or programs to support individuals who have experienced sex-based and sexual harassment at awardee institutions.
- **Recommendation 7a.3:** Federal research agencies should develop funding opportunities to support organizational climate assessments at awardee institutions. This should include funding for:
 - Contracting and/or hiring subject matter experts to design the assessment and/or train staff to conduct the assessment;
 - Implementing organizational climate assessments such as surveys, focus groups, and exit interviews;
 - Recruiting and incentivizing participants;
 - Analyzing assessment results;
 - Disseminating the results of these assessments to awardee leadership, staff, faculty, postdocs, researchers, and students; and
 - Carrying out the actions needed to address the results of such assessment.
- **Recommendation 7a.4:** Funding opportunities should foster collaboration across institutions, regions, and disciplines via:
 - Research partnerships;
 - Conferences, workshops, and roundtables;
 - Training and resource exchange models; and
 - Platforms for disseminating best practices.

¹⁰⁴ Dear Colleague Letter: Fostering Harassment-Free STEM Education, Research, and Workplace Environments. 2023. U.S. National Science Foundation. <https://new.nsf.gov/funding/opportunities/fostering-harassment-free-stem-education-research>

¹⁰⁵ Leading Culture Change Through Professional Societies of Biology (BIO-LEAPS). U.S. National Science Foundation. <https://new.nsf.gov/funding/opportunities/leading-culture-change-through-professional>

¹⁰⁶ Cultural Transformation in the Geoscience Community (CTGC). U.S. National Science Foundation. <https://new.nsf.gov/funding/opportunities/cultural-transformation-geoscience-community-ctgc>

7b. Offer Funding for Training at Awardee Institutions

Academic leaders set the tone for the culture of academic environments, including what actions are tolerated and what behaviors are rewarded.¹⁰⁷ Federal agency funding can support skills-building trainings for principal investigators, faculty, and senior leadership.¹⁰⁸

While it is important for individuals with positional authority to be properly equipped with tools for creating inclusive research environments and preventing/responding to sex-based and sexual harassment, it must be acknowledged that graduate students and postdocs are future investigators. To fully prepare these individuals for their future careers as academic leaders—and to effect change early within STEM talent pathways—students and early career researchers should also be trained on how to cultivate inclusive, productive, and harassment-free STEM environments.

- **Recommendation 7b.1:** Federal research agencies should consider creating opportunities that fund the development, implementation, and evaluation of the below trainings at awardee institutions. All trainings should be rooted in prevention research, acknowledge intersectional issues beyond sex-based discrimination and sexual harassment, and present culturally aware and STEM context-relevant situations about bias, bullying, and harassment. Where relevant, trainings should also include information on how to file complaints with federal research agencies, and as well as:
 - Training on sex-based and sexual harassment in research-specific contexts;
 - Trainings on harassment prevention, bias, bystander intervention, and other related trainings that incorporate best practices;
 - Civility promotion programs and other trainings designed to emphasize and foster positive interpersonal relationships in research environments;
 - Skills-development trainings on inclusive leadership, mentorship, and institutional change in research-specific contexts for graduate students, postdocs, and principal investigators; or
 - Training for department chairs, deans, and other leadership on supporting individuals who have experienced harassment and how to reduce the possibility for retaliation.

- **Recommendation 7b.2:** Agencies with the authority to fund such trainings should share results of their effectiveness with other agencies to generate best practices as part of communities of practice, working groups, or other interagency coordination bodies.

¹⁰⁷ Mattheis, et al. 2022. "Maybe this is just not the place for me:" Gender harassment and discrimination in the geosciences. PLOS One. <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0268562>

¹⁰⁸ Ending Sexual Harassment: Teaching of Principal Investigators (E-STOP). Stanford University, Salles Lab. <https://salleslab.stanford.edu/E-STOP>

Conclusion

Ending sex-based and sexual harassment in federally-funded STEM environments will require significant time, resources, and interagency collaboration. It will require federal agencies to: examine their current policies on sexual harassment prevention and reporting to ensure they are aligned with best practices and proven strategies; collaborate with other agencies to align harassment definitions and applicability; improve consistency and clarity across the processes for reporting harassment allegations; ensure awareness of harassment policies among award personnel; and increase transparency about the number of complaints received and the actions taken in response. However, ending sex-based and sexual harassment in STEM environments will not be achieved by changes to prevention policies and reporting requirements alone; it will also require a cultural shift toward embedding values of diversity, inclusion, and respect within institutions. Federal agencies can continue to support institutions by implementing innovative approaches that require award recipients to address how they will create safe and inclusive work environments while also addressing power dynamics and funding structures. Through continued work and dedication, sex-based and sexual harassment in STEM can be reduced to promote safer, more inclusive environments where people from all backgrounds can contribute to scientific breakthroughs and discoveries.

Appendix A. Further Areas to Explore for Federal Coordination

In addition to the recommendations for policy development/improvement included throughout this report, federal research agencies have an opportunity to utilize interagency coordination bodies to strengthen a coordinated federal effort to combat harassment in STEM environments. Areas that IWG-SISE and other interagency groups should consider for future exploration, infrastructure-building, and policy coordination include:

- Other forms of harassment: Agencies should work to ensure that prevention, reporting, and response policies for other kinds of harassment (e.g., based on race, disability, age, etc.) are as robust as those that exist for sex-based and sexual harassment and address intersectionality.
- Addressing misconduct before it rises to the level of unlawful harassment: Agencies should determine what actions they are able to take, if any, to address harassing behaviors before this conduct rises to the level of unlawful harassment.
- Graduate students as award personnel: Under the definition of award personnel provided in the CHIPS and Science Act (see above), graduate students are not explicitly included. However, graduate students who are considered employees may fall under this definition on certain federal research awards. For future policy development across reporting pathways, agencies should consult with awardee institutions to develop best practices for responding to complaints of harassment perpetuated by federally-funded graduate students. Agencies should consider requiring mandatory institutional reports of these instances—separate from and not in conflict with Title IX and Title VII reporting requirements—and what the impacts on the research community and award administrative consequences would be if graduate students were included in mandatory notifications to agencies.
- Updating universal regulations for financial assistance: For agencies to develop terms and conditions of awards that require mandatory notification of harassment findings by awardee institutions (Section 2a), they may have to go through a rule making process to update their financial assistance regulations or policies. Legislative or regulatory changes may be required for agencies to do this (see Appendix B). Alternatively, agencies could work together with the Office of Management and Budget to make such a mandatory notification requirement part of the universal regulations for financial assistance (2 CFR 200).¹⁰⁹
- Person-centered, trauma informed approaches: Agencies should explore how they can further implement and encourage trauma-informed, survivor-centered approaches to recognizing the impact of sex-based and sexual harassment in STEM environments, responding in a person-centered way, and preventing re-traumatization.¹¹⁰ This might include strategies such as customized anti-retaliation plans¹¹¹ or safety plans, or creating an evidence-based and role-specific training about trauma for all personnel who might receive disclosures of harassing conduct.
- A central federal reporting/information-sharing mechanism: Agencies should explore possibilities of creating a central, easily accessible, joint-agency website for reporting harassment and discrimination to federal funding agencies. A “one stop shop” (e.g., “harassment.gov”) would

¹⁰⁹ eCFR: 2 CFR Part 200 -- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200>

¹¹⁰ Practical Guide for Implementing a Trauma-Informed Approach. 2023. Substance Abuse and Mental Health Services Administration. <https://store.samhsa.gov/sites/default/files/pep23-06-05-005.pdf>

¹¹¹ Retaliation. Johns Hopkins University, Office of Institutional Equity. <https://oie.jhu.edu/retaliation/>

GUIDELINES FOR FEDERAL RESEARCH AGENCIES TO REDUCE SEX-BASED
AND SEXUAL HARASSMENT INVOLVING AWARD PERSONNEL

reduce burden on awardees who may have to submit the same report to multiple agencies and could aid information-sharing between agencies.

- Agencies should consider what information can and should be shared between funding agencies regarding reports of harassment at awardee institutions, what the consequences are of sharing information about award personnel, what temporary or permanent consequences will be for award personnel, how a secure platform can be accessed by agency staff, and how long information and reports will be stored.

Appendix B. Recommendations Regarding Legislative Changes

Legislative changes may support the efforts of federal agencies to fully implement the guidelines and recommendations detailed in this report.¹¹² These proposed changes are summarized in the table below.

Goals	Guideline Area	Changes That Would Support Implementation
1. Identify and Remove Gaps across Harassment Policies that Apply to Extramural Award Personnel	1b. Consistency Across Harassment Definitions	Explicit authority or direction for agencies to develop a common definition of harassment that applies to all federally-funded extramural award personnel
2. Improve Consistency Across Processes for Reporting to Agencies	2a. Pathway 1: Mandatory Notification	Explicit authority or direction for agencies to create mandatory notification processes that require awardees submit reports regarding findings /determinations of harassment involving award personnel
2. Improve Consistency Across Processes for Reporting to Agencies	2b. Pathway 2: Civil Rights Violation Reporting 2c. Pathway 3: Option for Award Personnel and other Individuals to Share Information Without Filing a Complaint	Explicit authority or direction for agencies to modify existing regulations; appropriation of funds for increased staffing support directed to agency offices responsible for processing and investigating harassment reports
7. Provide Funding Opportunities for Sexual Harassment Research, Evaluation, and Training	7a. Offer Funding for Awardees to Generate Evidence and Inform Best Practices 7b. Offer Funding for Training at Awardee Institutions	Explicit authority or direction for agencies to develop funding opportunities and/or award supplements to support research on harassment prevention and reduction, policy evaluation, climate assessments, and evidence-based training programs at awardee institutions; Appropriation of funds to support these efforts

¹¹² For example, The CHIPS and Science Act mandated this report to include guidelines for agencies to require awardees to submit reports of harassment (mandatory notification pathway described in Section 2a). In 2018, when NSF released its term and condition on sexual harassment that required mandatory notification by awardees, then NIH Director Francis Collins said: “Legal constraints that apply differently to NSF and NIH currently prevent NIH from immediate implementation of an identical policy. A rulemaking process would be needed to determine if NIH can require the same responses from our awardee organizations.” NIH’s policy on mandatory awardee reporting was released in 2022, only when NIH was given the authority to implement such a policy by Public Law 117-103, Division H, Title II, Section 239. See: <https://www.nih.gov/about-nih/who-we-are/nih-director/statements/additional-information-sexual-harassment-policy-nih>; <https://www.congress.gov/bill/117th-congress/house-bill/2471/text>