



OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR

NOV 16 2015

Memorandum

To: Jon Jarvis
Director, National Park Service

From: Mary L. Kendall *Mary L. Kendall*
Deputy Inspector General

Subject: Management Advisory – Distribution of Letter and Declarations sent to Secretary Sally Jewell
Action and Response Requested
Case No. OI-PI-14-0695-I

In September 2014, U.S. Department of the Interior (DOI) Secretary Sally Jewell received a letter of complaint and request for investigation from 13 former and current National Park Service (NPS) employees who had worked at various times in the Grand Canyon National Park's (GRCA) River District. The 13 complainants submitted declarations describing incidents of sexual harassment and hostile work environment that they experienced or witnessed over a period of approximately 15 years.

These declarations contained sensitive and private information about the 13 complainants, including their names, mailing addresses, and telephone numbers. During our investigation of the complaints, we discovered that GRCA supervisors and managers violated NPS policy by forwarding the letter and declarations to various employees who had no need to review the materials.

We found that GRCA Deputy Superintendent Diane Chalfant authorized the letter and declarations to be provided to GRCA Chief Ranger [REDACTED] and Supervisory Ranger [REDACTED]. Chalfant said that she thought the letter and declarations were "public documents," and therefore it was permissible to distribute them to [REDACTED] and [REDACTED].

[REDACTED] authorized [REDACTED] to provide the letter and declarations to his employees, then-River Patrol Supervisor [REDACTED] and then-Small Craft Operator [REDACTED] both of whom were named as suspects in the letter and declarations. Chalfant said that she authorized [REDACTED] to provide the letter and declarations to [REDACTED] but not to [REDACTED] and [REDACTED]. [REDACTED] acknowledged that he authorized [REDACTED] to provide the letter and declarations to [REDACTED] and [REDACTED]. [REDACTED] acknowledged that he distributed the letter and declarations to at least one other GRCA employee.

Our review of relevant NPS regulations and policies confirmed that the confidentiality of individuals who report harassment must be protected as much as possible. Distributing the letter and declarations to [REDACTED] and [REDACTED] violated the following NPS policies and regulations:

- NPS Director’s Order #16F, “National Park Service Anti-Harassment Policy,” dated December 28, 2011, states: “The service will assure confidentiality of the individual who brings claims of harassment forward.”
- Intermountain Regional Director’s memorandum, titled “Sexual Harassment Prevention and Anti-Harassment Policy,” dated January 14, 2013, states: “Parties involved in the process [reporting and investigating of sexual harassment] will respect the confidentiality and privacy of individuals reporting allegations of . . . sexual harassment.”
- NPS Regulation Manual 9, Chapter 16, “Internal Investigations,” states: “It is the responsibility of all park, regional, and OPR staff to protect the confidentiality of all complainants.”

NPS must respect the confidentiality and privacy of individuals who report sexual harassment by not revealing their identities to others who do not have a legitimate, work-related need to know them. We therefore recommend that NPS—

1. review its regulations and policies regarding the confidentiality of individuals reporting sexual harassment, and consider revising them to be more specific about when, under what circumstances, and to whom the identities of these individuals can be revealed; and
2. provide additional training to its managers on the proper handling and dissemination of documents containing reports of sexual harassment and the identities of the individuals making those reports.

Please provide a written response and a completed Accountability Form (attached) within 90 days of receiving this management advisory indicating how you intend to implement our recommendations. We will periodically forward this information to Congress and DOI, and will also use it in our internal reviews.

You may mail your response to:

Office of Inspector General
U.S. Department of the Interior
381 Elden Street, Suite 3000
Herndon, VA 20170

If you prefer, you may email your response to doioigreferrals@doioig.gov. This email address can also be used to advise us that you have mailed your response to us or, if necessary, to request an extension to the due date. An extension request should include a brief status summary and an anticipated completion date.

If you have any questions or need further information, please contact [REDACTED]
[REDACTED], Assistant Special Agent in Charge, at [REDACTED].

Attachment

cc: Tommy Beaudreau, Chief of Staff, Department of the Interior