



# **FY 2025**

## **Notification and Federal Employee Antidiscrimination and Retaliation Act Report**

**United States Section  
International Boundary and Water Commission  
Office of Civil Rights and Equal Employment Opportunity**

## Purpose

Congress passed the Notification and Federal Employee Antidiscrimination and Retaliation Act of 2002, the “No FEAR Act”, to hold Federal agencies more accountable for violations of antidiscrimination and whistleblower protection laws. Congress determined that requiring annual reports to Congress on the number and severity of discrimination and whistleblower cases brought against each Federal agency enables improved oversight of agency compliance with these laws.

Accordingly, the No FEAR Act requires each agency, no later than 180 days after the end of each fiscal year, to submit a report to the Speaker of the U.S. House of Representatives, the President pro tempore of the U.S. Senate, the Committee on Homeland Security and Governmental Affairs of the Senate, the Committee on Oversight and Accountability of the House of Representatives, each committee of Congress with jurisdiction relating to the agency, the Chair of the Equal Employment Opportunity Commission (EEOC), and the Attorney General of the United States. Regulations issued by the Office of Personnel Management (OPM) implementing the No FEAR Act, codified at 5 Code of Federal Regulations (C.F.R.) Part 724, Subpart C, also require submission of this annual report to the Director of OPM.

Pursuant to these statutory and regulatory requirements, this report provides information regarding Federal court cases arising under applicable antidiscrimination and whistleblower protection laws, the status and disposition of such cases, any reimbursements to the Judgment Fund, disciplinary actions taken in connection with violations of these laws, and year-end data relating to Federal sector Equal Employment Opportunity (EEO) complaint activity. The report further includes an analysis of trends, causation, and practical knowledge gained through the agency’s experience, as well as actions taken or planned to improve the agency’s Civil Rights program. In addition, the report describes the agency’s training program related to the No FEAR Act.

The U.S. Section of the International Boundary and Water Commission (USIBWC) prepares and submits this report to comply with these statutory and regulatory requirements. IBWC’s No FEAR Act data, including the Agency’s most recent No FEAR Act Notice and quarterly reporting data, is publicly available on the agency’s website at [IBWC Home - IBWC](#).

The primary purpose of the No FEAR Act, Public Law 107-174, is to improve Federal agency accountability for violations of antidiscrimination and whistleblower protection laws related to employment and to ensure that employees, applicants for employment, and former employees are informed of their rights under these laws. By strengthening accountability and transparency, the Act supports the reduction of workplace discrimination within the Federal government.

This report covers Fiscal Year 2025 (October 1, 2024, through September 30, 2025).

## Executive Summary

During Fiscal Year (FY) 2025, the USIBWC maintained a mature, prevention-focused EEO and Civil Rights program characterized by low complaint volume, absence of adverse findings, and full compliance with statutory and regulatory requirements.

The agency managed a workforce of 270 employees and a total of five EEO complaints, including three carried over from the prior fiscal year and two newly filed complaints. When evaluated relative to workforce size, this equates to approximately 1.85 complaints per 100 employees, reflecting a low complaint rate that remains consistent with prior fiscal years and a stable organizational environment.

Notably, there were no findings of discrimination, no Judgment Fund payments, and no disciplinary actions associated with violations of Federal antidiscrimination or whistleblower protection laws. These outcomes indicate that the agency's internal controls, leadership accountability, and early-resolution strategies are functioning effectively to mitigate legal, financial, and reputational risk.

The agency continued to emphasize prevention through mandatory annual No FEAR Act and EEO training, as well as targeted reasonable accommodation training for employees and supervisors. These efforts reinforce awareness, strengthen management accountability, and support compliance across all levels of the organization.

Overall, FY 2025 results reflect a mature, prevention-focused Civil Rights program that is operating effectively, maintaining compliance, and sustaining a workplace environment free from discrimination, harassment, and retaliation.

## 5 CFR § 724.302(a)(1) – Federal Court Cases

**The number of cases in Federal court pending or resolved in each fiscal year and arising under the respective provisions of the Federal Antidiscrimination Laws and Whistleblower Protection Laws applicable to the agency, as defined in § 724.102 of subpart A of this part, in which an employee, former Federal employee, or applicant alleged a violation of these laws, separated by the provision(s) of law involved.**

The number of cases in Federal court pending or resolved during FY 2025 arising under the Federal Antidiscrimination Laws and Whistleblower Protection Laws, as defined in § 724.102 of subpart A of this part, in which an employee, former employee, or applicant alleged a violation of these laws, is zero. No cases were filed, pending, or resolved under these provisions during the reporting period.

### **5 CFR § 724.302(a)(2) – Status and Judgment Fund**

**In the aggregate, for the cases identified in paragraph (a)(1) of this section and separated by provision(s) of law involved:**

- (i) The status or disposition (including settlement);**
- (ii) The amount of money required to be reimbursed to the Judgment Fund by the agency for payments as defined in § 724.102 of subpart A of this part; and**
- (iii) The amount of reimbursement to the Fund for attorney's fees where such fees have been separately designated.**

The cases identified in 5 CFR § 724.302(a)(1), separated by provision(s) of law involved, reflect the following for FY 2025:

- (i) There are no cases with a status or disposition, including settlement, to report for the specified period.
- (ii) No amount of money has been required to be reimbursed to the Judgment Fund by the agency for payments as defined in § 724.102 of subpart A of this part.
- (iii) No reimbursement to the Judgment Fund for attorney's fees has occurred, as there were zero cases resolved during the reporting period requiring the designation of such fees.

### **5 CFR § 724.302(a)(3) – Disciplinary Actions (Court Cases)**

**In connection with cases identified in paragraph (a)(1) of this section, the total number of employees in each fiscal year disciplined, as defined in § 724.102 of subpart A of this part, and the specific nature of the disciplinary actions taken, separated by the provision(s) of law involved.**

In connection with the cases identified in 5 CFR § 724.302(a)(1), there were no employees disciplined during FY 2025, as defined in § 724.102 of subpart A of this part. Accordingly, there are no disciplinary actions, including reprimands or other corrective measures, to report for the specified period.

### **5 CFR § 724.302(a)(4) – EEO Complaint Data**

**The final year-end data about discrimination complaints for each fiscal year that was posted in accordance with Equal Employment Opportunity Regulations at subpart G of title 29 of the Code of Federal Regulations (implementing section 301(c)(1)(B) of the No FEAR Act).**

The final year-end data about discrimination complaints for FY 2025, posted in accordance with Equal Employment Opportunity Regulations at subpart G of title 29 of the Code of Federal Regulations (implementing section 301(c)(1)(B) of the No FEAR Act), is as follows:

### Formal EEO Complaint Activity Summary

During FY 2025, the agency managed a total of five formal EEO complaints. This includes three complaints pending at the beginning of the fiscal year and two new complaints filed during the reporting period. During the fiscal year, three complaints were closed. At the close of the fiscal year, two complaints remained pending, representing matters still in the administrative process with no final resolution issued.

Appellate activity during FY 2025 reflects that one matter proceeded through the EEOC appellate process, resulting in a remand to the Agency for further processing. Following the remand, the complainant elected to request a hearing before an EEOC Administrative Judge.

Overall, the data reflects continued low complaint volume and steady case processing activity, consistent with prior fiscal years. Complaint activity remains limited relative to the size of the agency's workforce, and the number of new complaints filed during the reporting period remains consistent with historical trends.

The following tables provide detailed information regarding formal EEO complaint activity, as well as hearing-level case processing and appellate review outcomes associated with those complaints.

### Formal EEO Complaint Activity Summary (FY 2025)

| Category                   | FY 2025 |
|----------------------------|---------|
| Workforce Size             | 270     |
| Pending at Beginning of FY | 3       |
| New Complaints Filed       | 2       |
| Total Complaints Managed   | 5       |
| Complaints Closed          | 3       |
| Pending at End of FY       | 2       |

*This table summarizes formal EEO complaint activity for FY 2025, including complaint inventory, new filings, and case dispositions, consistent with data reported in the agency's EEOC Form 462 submissions.*

## EEOC Administrative Hearing Activity and Case Disposition by Fiscal Year

| Closing FY | Hearing No.     | Date Requested | Closure Date | Status                                                              |
|------------|-----------------|----------------|--------------|---------------------------------------------------------------------|
| FY 2021    | 451-2019-00177X | 6/5/2019       | 10/20/2020   | Closed. Decision issued without a hearing (in favor of the Agency). |
| FY 2021    | 451-2018-00272X | 8/29/2018      | 7/22/2021    | Closed. Decision issued without a hearing (in favor of the Agency). |
| FY 2022    | 451-2021-00098X | 12/29/2020     | 12/14/2021   | Closed. Decision issued without a hearing (in favor of the Agency). |
| FY 2023    | 450-2023-00074X | 12/12/2022     | 4/5/2023     | Closed. Decision issued without a hearing (in favor of the Agency). |
| FY 2023    | 450-2021-00179X | 3/4/2021       | 7/11/2023    | Closed. Decision issued without a hearing (in favor of the Agency). |
| FY 2024    | 450-2024-00346X | 4/1/2024       | 8/12/2024    | Closed. Decision issued without a hearing (in favor of the Agency). |
| FY 2024    | 450-2023-00223X | 4/27/2023      | 10/10/2023   | Closed. Settled.                                                    |
| FY 2024    | 450-2024-00160X | 4/1/2024       | 4/1/2024     | Closed. Hearing request dismissed.                                  |
| FY 2025    | 451-2025-00006X | 10/12/2024     | 3/27/2025    | Closed. Decision issued without a hearing (in favor of the Agency). |
| FY 2025    | 450-2025-00167X | 3/28/2025      | 7/2/2025     | Closed. Settled.                                                    |

*This table reflects the status and disposition of EEO complaints that proceeded to the hearing stage before an EEOC Administrative Judge, including decisions issued without a hearing, settlements, and procedural dismissals.*

## EEOC Appellate Review Activity and Disposition by Fiscal Year

| Closing FY | Appeal No. | Date Filed | Closure Date | Status                                                                         |
|------------|------------|------------|--------------|--------------------------------------------------------------------------------|
| FY 2021    | 2021001091 | 12/1/2020  | 4/6/2021     | Closed. Settled.                                                               |
| FY 2021    | 2021000366 | 10/20/2020 | 7/8/2021     | Closed. Agency's final action affirmed; no discrimination found.               |
| FY 2024    | 2024002328 | 2/23/2024  | 7/2/2024     | Closed. Agency decision vacated and complaint remanded for further processing. |
| FY 2025    | 2024004131 | 7/5/2024   | 10/16/2024   | Closed. Remanded to the Agency for further processing.                         |

*This table summarizes appellate activity and outcomes for EEO complaints that proceeded through the EEOC appellate review process, including affirmations, remands, and settlements.*

## 5 CFR § 724.302(a)(5) – Disciplinary Actions (Non-Court)

**Whether or not in connection with cases in Federal court, the number of employees in each fiscal year disciplined, as defined in § 724.102 of subpart A of this part, in accordance with any agency policy described in paragraph (a)(6) of this section. The specific nature of the disciplinary actions taken must be identified.**

During FY 2025, no employees were disciplined, as defined in § 724.102 of subpart A of this part. Accordingly, there are no disciplinary actions, including reprimands or other corrective measures, to report for the specified period.

## 5 CFR § 724.302(a)(6) – Disciplinary Policy

**A detailed description of the agency's policy for taking disciplinary action against Federal employees for conduct that is inconsistent with Federal antidiscrimination laws and whistleblower protection laws, or other prohibited personnel practices identified during agency investigations of alleged violations of these laws.**

The USIBWC maintains an integrated framework of policies and procedures designed to prevent, identify, and address conduct that is inconsistent with Federal antidiscrimination laws, whistleblower protection laws, and other prohibited personnel practices.

Central to this framework is the agency's Anti-Harassment Policy and Procedures, which expressly prohibits both EEO and non-EEO harassment and establishes clear expectations for workplace conduct. The policy defines prohibited behaviors, including conduct based on protected categories such as race, color, religion, age (40 years or older), disability (physical or mental), national origin, reprisal, sex (including pregnancy and related medical conditions, consistent with applicable law), genetic information, and reprisal for prior EEO activity, as well as non-EEO harassment such as bullying or inappropriate workplace behavior. The policy requires prompt management response, immediate inquiry into allegations, and appropriate corrective action.

The agency's Employee Code of Conduct, aligned with Executive Order 12674 and 5 C.F.R. Part 2635, establishes the ethical standards governing employee behavior and reinforces the obligation to uphold the public trust. Employees are required to adhere to these principles and acknowledge their understanding of the Code on a recurring basis. Violations of these standards may result in disciplinary action, including removal from Federal service, where appropriate.

In addition, the Employee Conduct Manual provides agency-wide procedures for addressing misconduct and supports consistent application of disciplinary measures. The agency applies a progressive discipline model, ensuring that corrective actions are proportionate to the nature and severity of the misconduct, while also considering relevant aggravating and mitigating factors.

Supervisors and managers are required to take prompt and appropriate action when misconduct is identified, including initiating inquiries, consulting with appropriate offices, and implementing corrective or disciplinary measures as warranted. Responses are expected to be timely, consistent, and well-documented in accordance with Federal requirements and agency policy.

In recognition of the agency's small size and the increased potential for both actual and perceived conflicts of interest in closely connected work environments, USIBWC has implemented additional structural safeguards to preserve the integrity and credibility of its investigative processes. The agency utilizes contracted third-party investigators to conduct EEO investigations, thereby preserving neutrality and credibility in the formal complaint process. Separately, the agency maintains trained collateral-duty investigators to conduct inquiries and investigations arising under the Anti-Harassment Program, including more

complex cases, supporting timely internal review of workplace concerns and early intervention where appropriate.

This approach ensures that investigations are conducted in an objective, impartial, and unbiased manner, independent of internal reporting relationships or organizational dynamics. The use of external investigators strengthens employee confidence in the fairness of the process, enhances the credibility of investigative findings, and supports the defensibility of any resulting disciplinary or corrective actions.

Through this comprehensive framework of policy, accountability, and independent investigative practices, the agency maintains a disciplined, transparent, and credible approach to addressing workplace misconduct and upholding Federal civil rights and whistleblower protection requirements.

## 5 CFR § 724.302(a)(7) – Analysis

**An analysis of the information provided in paragraphs (a)(1) through (6) of this section in conjunction with data provided to the Equal Employment Opportunity Commission in compliance with 29 CFR part 1614 subpart F of the Code of Federal Regulations. Such analysis includes an examination of trends, causal factors, practical knowledge gained through experience, and actions planned or taken to improve the agency’s civil rights program.**

### Examination of Trends

A review of the agency’s EEOC Form 462 data reflects a consistently low level of formal EEO complaint activity across recent fiscal years. The agency managed a total of 3 complaints in FY 2022, 4 in FY 2023, 3 in FY 2024, and 5 in FY 2025. The number of new complaints filed remained relatively consistent during this period, with 2 complaints filed in FY 2022, FY 2023, and FY 2025, and 1 complaint filed in FY 2024.

Complaints pending at the end of each fiscal year remained low and stable, with 2 complaints pending at the close of each fiscal year from FY 2022 through FY 2025. This consistency indicates that complaint inventory has remained controlled over time and that case processing has kept pace with incoming complaint activity.

### Workforce and Complaint Volume Trend (FY22–FY25)

| Closing FY | Workforce Size | New Complaints Filed | Total Complaints Managed | Pending (End of FY) |
|------------|----------------|----------------------|--------------------------|---------------------|
| FY 2022    | 267            | 2                    | 3                        | 2                   |
| FY 2023    | 255            | 2                    | 4                        | 2                   |
| FY 2024    | 279            | 1                    | 3                        | 2                   |
| FY 2025    | 270            | 2                    | 5                        | 2                   |

*This table presents formal EEO complaint activity in relation to workforce size across fiscal years, consistent with EEOC Form 462 data. The data reflects stable complaint volume and controlled inventory levels, with no sustained increase in new complaint filings over time.*

### Complaint Rate per 100 Employees (FY 2022–FY 2025)

| Fiscal Year | Workforce Size | Total Complaints Managed | Complaint Rate (per 100 Employees) |
|-------------|----------------|--------------------------|------------------------------------|
| FY 2022     | 267            | 3                        | 1.12                               |
| FY 2023     | 255            | 4                        | 1.57                               |
| FY 2024     | 279            | 3                        | 1.08                               |
| FY 2025     | 270            | 5                        | 1.85                               |

*This table presents complaint rates normalized to workforce size, providing a consistent basis for evaluating trends in complaint activity over time. Complaint rates remain low overall, with variations attributable to workforce size and case carryover rather than increases in new complaint filings.*

Workforce figures reported in the EEOC Form 462 were 267 in FY 2022, 255 in FY 2023, 279 in FY 2024, and 270 in FY 2025. When complaint activity is evaluated relative to workforce size, complaint rates remain low and proportionate. The complaint rate per 100 employees was 1.12 in FY 2022, 1.57 in FY 2023, 1.08 in FY 2024, and 1.85 in FY 2025.

The increase in total complaints managed in FY 2025 is attributable to matters carried over at the beginning of the fiscal year rather than an increase in new filings, which remained stable. This distinction demonstrates that the underlying rate of new complaint activity has not increased and that the agency’s overall complaint environment remains controlled.

#### Pre-Complaint Activity

Pre-complaint activity data further reflects the agency’s proactive approach to addressing workplace concerns at the earliest possible stage. In FY 2025, six pre-complaint matters were initiated, five were completed or otherwise resolved prior to formal filing, including two settlements and one withdrawal, and two proceeded to formal complaint.

These outcomes demonstrate that the pre-complaint process is functioning as more than a procedural requirement; it serves as a critical early intervention mechanism that enables timely identification and resolution of workplace concerns. The agency places a strong emphasis on manager engagement, communication, and accountability, ensuring that supervisors understand their responsibility to address issues promptly and appropriately before they escalate.

In addition, the agency maintains internal mediation capability through a neutral mediator within the Office of Civil Rights and EEO (CREEO), supplemented by a newly trained and certified collateral-duty mediator in FY 2025 who operates outside of the EEO function, as well as the Director of the Office of CREEO, who is an experienced certified mediator. This capability supports the agency’s Conflict Resolution Program, enhances neutrality, facilitates timely mediation, and helps expedite the resolution of workplace concerns.

This approach reflects an intentional management model that prioritizes early identification, open communication, and resolution of workplace concerns at the lowest possible level. As a result, a significant portion of matters are resolved or narrowed prior to entering the formal EEO process, contributing to the agency’s sustained low complaint volume and overall stability of its complaint environment.

### Pre-Complaint (Counseling) Activity and Outcomes (FY 2025)

| Counseling                    | FY 2025 |
|-------------------------------|---------|
| Pre-Complaints Initiated      | 6       |
| Completed / Ended             | 5       |
| Settlements                   | 2       |
| Withdrawals                   | 1       |
| Proceeded to Formal Complaint | 2       |

*This table summarizes pre-complaint counseling activity and outcomes, demonstrating the agency's use of early resolution mechanisms. The majority of matters were resolved prior to formal complaint filing, supporting the effectiveness of early intervention efforts.*

### Program Capacity

The agency's continued investment in and use of program resources directly supports these outcomes. The FY 2025 EEOC Form 462 reflects a workforce of 270 employees supported by nine collateral-duty EEO counselors and two collateral-duty investigators, all of whom completed required training. Staffing levels increased beginning in FY 2023 and have been maintained through FY 2025, reflecting a strengthened program infrastructure to support early resolution and complaint processing.

### Causal Analysis

The agency's program capacity, as reflected in EEOC Form 462 data, supports its ability to effectively administer complaint processing and counseling functions. In FY 2025, the agency maintained nine collateral-duty EEO counselors, and two collateral-duty investigators to support a workforce of 270 employees.

In prior fiscal years, the agency maintained nine collateral-duty counselors in FY 2023 and FY 2024, and three collateral-duty counselors in FY 2022, with no collateral-duty investigators reported until FY 2025. This progression reflects the agency's continued strengthening of its program infrastructure to support early resolution, complaint processing, and compliance oversight.

This staffing model ensures that sufficient trained personnel are available to support intake, counseling, and investigative functions, contributing to timely case processing and effective issue resolution.

### EEO Program Capacity (Form 462 Staffing)

| Fiscal Year | Workforce Size | EEO Counselors<br>(Collateral Duty) | EEO Investigators<br>(Collateral Duty) |
|-------------|----------------|-------------------------------------|----------------------------------------|
| FY 2022     | 267            | 3                                   | 0                                      |
| FY 2023     | 255            | 9                                   | 0                                      |
| FY 2024     | 279            | 9                                   | 0                                      |
| FY 2025     | 270            | 9                                   | 2                                      |

*This table reflects EEO program staffing and resource capacity, supporting the agency's ability to administer complaint processing and counseling functions effectively.*

Several interrelated factors contribute to the agency's sustained low level of formal complaint activity.

First, the consistency in new complaint filings across multiple fiscal years indicates that workplace concerns are not increasing at a rate disproportionate to agency operations. Even as workforce levels fluctuate, complaint volume has remained stable, suggesting that underlying workplace conditions are effectively managed.

Second, pre-complaint data demonstrates that a significant portion of workplace concerns are addressed prior to escalation into the formal EEO process. The agency's emphasis on early intervention, communication, and manager engagement contributes directly to these outcomes.

Third, the agency's continued investment in and use of external investigative resources serves as a critical risk mitigation strategy. By leveraging independent third-party investigators, the agency enhances the neutrality and credibility of its investigative processes, reinforces employee trust in the fairness of outcomes, and strengthens the defensibility of investigative findings.

Fourth, the agency's Conflict Resolution Program, supported by internal mediation capability, contributes to the early resolution of workplace concerns. The availability of trained and certified mediators, including both EEO and non-EEO personnel, enhances neutrality, facilitates timely mediation, and reduces the likelihood that matters will escalate into formal EEO complaints.

Collectively, these factors contribute to a well-controlled complaint environment and support the agency's ability to resolve workplace concerns at the earliest possible stage.

The USIBWC places a strong emphasis on educating managers regarding their responsibilities to address workplace concerns early, engage in effective communication, and take appropriate action before issues escalate into formal EEO complaints. This approach reflects an intentional management model that prioritizes early identification, communication, and resolution of workplace concerns before escalating into the formal EEO process.

### **Practical Knowledge Gained Through Experience**

The agency's recent EEOC Form 462 data reinforces the importance of maintaining a proactive, prevention-focused Civil Rights program that emphasizes early resolution, trained personnel, and leadership engagement. Despite fluctuations in workforce size, the number of new complaints has remained stable, indicating that internal controls and program structures are effectively managing workplace concerns.

Experience has also demonstrated that in a small agency environment, structural considerations must be incorporated into program design to ensure both actual and

perceived fairness. Close working relationships, overlapping roles, and limited organizational separation can increase the likelihood of perceived conflicts of interest in the investigation of workplace concerns, particularly those involving harassment.

In response, the agency has adopted a deliberate approach to investigative processes that distinguishes between formal EEO investigations and internal anti-harassment inquiries and investigations. Contracted third-party investigators are used to conduct EEO investigations in order to preserve neutrality and credibility in the formal complaint process. Separately, trained collateral-duty investigators conduct inquiries and investigations arising under the Anti-Harassment Program, including more complex matters. This structure supports timely internal review of workplace concerns, facilitates early intervention where appropriate, and helps mitigate the influence of internal organizational dynamics.

### **Actions Taken and Planned to Improve Complaint or Civil Rights Programs**

The agency continues to strengthen its Civil Rights program through targeted training, sustained investment in program infrastructure, and strategic process improvements. In FY 2025, the agency maintained trained collateral-duty EEO counselors, investigators, and mediators, and ensured that required training was completed for both new and experienced personnel.

The agency's continued investment in and use of external investigative resources represents a key program enhancement and risk mitigation strategy. By using independent third-party investigators, the agency enhances the neutrality and credibility of its investigative processes, reinforces employee trust in the fairness of outcomes, and improves the defensibility of investigative findings.

Looking forward, the agency will continue to emphasize early resolution practices, maintain a trained and responsive EEO workforce, and strengthen supervisory understanding of EEO responsibilities and reasonable accommodation obligations. These efforts will support continued compliance, reduce potential risk, and ensure that the agency sustains a workplace environment grounded in fairness, accountability, and transparency.

## **5 CFR § 724.302(a)(8) – Budget Adjustments**

**For each fiscal year, any adjustment needed or made to the budget of the agency to comply with its Judgment Fund reimbursement obligation(s) incurred under § 724.103 of subpart A of this part.**

No budget adjustments were required during the reporting period, as no cases during FY 2025 required reimbursement to the Judgment Fund under § 724.103 of subpart A of this part.

## 5 CFR § 724.302(a)(9) – Training

**The agency’s written plan developed under § 724.203(a) of subpart B of this part to train its employees.**

The Office of CREEO maintains a written training plan developed in accordance with § 724.203(a) of subpart B, which outlines a comprehensive strategy to ensure that all employees are informed of their rights and responsibilities under Federal antidiscrimination laws and whistleblower protection laws.

During FY 2025, CREEO implemented this plan through the delivery of mandatory No FEAR Act and EEO training for all employees and managers. In addition, CREEO provided targeted training on reasonable accommodations and conflict resolution to both employees and supervisors, reinforcing understanding of the interactive process and management responsibilities under applicable laws and regulations.

The agency’s CREEO training program is designed to promote awareness, accountability, and compliance across all levels of the organization. Training content emphasizes the prevention of discrimination, harassment, and retaliation; the proper handling of workplace concerns; and the protection of individuals who engage in protected activity. The program also reinforces management responsibilities for responding promptly and appropriately to workplace issues.

CREEO continues to evaluate and enhance its training efforts to ensure alignment with current legal requirements, organizational needs, and emerging workplace considerations. Through this structured training approach, the agency supports a workplace environment grounded in respect, accountability, and adherence to Federal civil rights and whistleblower protection requirements.

## 5 CFR § 724.302 – Initial Reporting Requirement

**The first report also must provide information for the data elements in paragraph (a) of this section for each of the five fiscal years preceding the fiscal year on which the first report is based, to the extent that such data is available.**

This requirement applies only to the agency’s initial No FEAR Act report. As this is not the agency’s first submission under the No FEAR Act, the reporting requirement under 5 CFR § 724.302(b) is not applicable to FY 2025.

## Conclusion

The USIBWC continues to demonstrate a strong and effective EEO and Civil Rights program grounded in compliance, accountability, and proactive risk management.

During FY 2025, the agency maintained low complaint activity relative to workforce size, with no findings of discrimination, no Judgment Fund liability, and no disciplinary actions associated with violations of Federal antidiscrimination or whistleblower protection laws. These outcomes reflect a program that is functioning as intended and supported by effective internal controls, leadership engagement, and consistent application of policy.

The agency's continued emphasis on prevention, early resolution, and management accountability has contributed to a stable complaint environment and minimized escalation of workplace concerns. The use of trained collateral-duty counselors, investigators, and mediators, combined with targeted training initiatives, supports the agency's ability to address issues promptly and effectively.

From a strategic perspective, these results indicate that the agency is successfully mitigating legal, operational, and reputational risk while maintaining compliance with Federal requirements. The stability in complaint trends across multiple fiscal years further demonstrates the effectiveness of the agency's prevention-focused approach and internal programs.

Looking forward, the agency will continue to strengthen its Civil Rights program by sustaining early intervention practices, enhancing supervisory training, and maintaining a trained and responsive EEO workforce. These efforts will ensure continued alignment with Federal requirements and support a workplace environment grounded in fairness, accountability, and respect.

Collectively, these outcomes position the agency as a small but highly effective organization with a well-controlled EEO environment and a strong commitment to accountability, prevention, and compliance.

## Submission

The report is submitted in accordance with 5 C.F.R. Part 724.