



UNITED STATES MARINE CORPS
MARINE CORPS INSTALLATIONS NATIONAL CAPITAL REGION
MARINE CORPS BASE QUANTICO
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MCINCR-MCBQO 5354.1E
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MARINE CORPS INSTALLATIONS NATIONAL CAPITAL REGION-MARINE CORPS BASE QUANTICO
ORDER 5354.1E

From: Commander, Marine Corps Installations National Capital Region-Marine
Corps Base Quantico

To: Distribution List

Subj: PROHIBITED ACTIVITIES AND CONDUCT (PAC) PREVENTION AND RESPONSE POLICY

Ref: (a) MCO 5354.1E W/Admin CH
(b) SECNAV M-5210.1
(c) JAGINST 5800.7F
(d) MCO 3504.2A
(e) Functional Area Checklist PAC (5354)
(f) 29 CFR, Part 1614.102(a)(4)
(g) SECNAVINST 5300.26D
(h) 5 CFR, part 724

Encl: (1) Unit Listing
(2) Prohibited Activities and Conduct Procedures for Prevention
(3) Prohibited Activities and Conduct Procedures for Response
(4) Prohibited Activities and Conduct Flowchart
(5) Commander's DEOCS Checklist and Tracking
(6) DASH Checklist

1. Situation

a. Marine Corps Installations National Capital Region - Marine Corps Base Quantico (MCINCR-MCBQ) serves as the "Crossroads of the Marine Corps", providing critical support to a variety of Marine Corps and intergovernmental agencies. Our ability to effectively serve our tenant commands, Marines and their families is dependent on the fair and equitable treatment of all command members. All personnel will be treated with dignity and respect and be assured that they are a valued member of the unit.

b. This policy implements reference (a) and outlines administrative protocols for preventing and responding to PAC allegations. It outlines individual and command roles and responsibilities as well as administrative requirements for command climate monitoring.

c. This order applies to all commands for whom the Commander, MCINCR-MCBQ serves as the General Court Martial Convening Authority (GCMCA) (Enclosure 1). Commanders, O-5 and above, shall publish a local policy for their respective commands with the guidance and procedures set forth in this Order.

2. Mission.

a. MCINCR-MCBQ affords all personnel the opportunity to achieve their full potential by creating an environment that fosters military readiness, unit cohesion and mission accomplishment and ensures an appropriate understanding of how to prevent or respond to any behavior considered prohibited activity or conduct.

DISTRIBUTION STATEMENT A: Approved for public release

3. Execution

a. Commander's Intent

(1) To promote an environment free from personal or social barriers that prevent Marines from achieving the highest level of their potential.

(2) To establish policy and procedures for the prevention and response of prohibited activities and conduct complaints and ensure full compliance with reference (a).

(3) To ensure military readiness, unit cohesion and mission accomplishment.

b. Concept of Operations. This command will make every effort to eradicate unprofessional and unacceptable behavior from the ranks. Prohibited activities and conduct are fundamentally inconsistent with our core values and ethos and will not be tolerated. We will:

(1) Facilitate appropriate and responsive care and services for those Marines and Sailors adversely impacted by prohibited activities and conduct.

(2) Ensure personnel assigned to the command foster a climate of dignity, respect, and trust for all.

(3) Utilize the chain of command as the primary and preferred channel to ensure the organizational environment is free of prohibited activities and conduct.

(4) Ensure PAC-related allegations are reported to the Commander to which complainants and subjects are administratively assigned.

(5) Ensure individuals are aware of all available reporting avenues.

(6) Ensure those who participate in protected communications are protected from reprisal or retaliation.

(7) Use information obtained from both formal and informal climate assessments to make improvements where needed within the command.

(8) Ensure members of the command are trained on the content of reference (a), at a minimum, annually.

(9) Ensure substantiated incident(s) of prohibited activities and conduct outlined in reference (a) are documented in the subject member's Official Military Personnel File (OMPF).

c. Staff Responsibilities

(1) Chief of Staff

(a) Provide oversight of all staff functions, ensuring command compliance with reference (a). All violations of reference (a), once substantiated by a Convening Authority, shall be reported to the Installation Commander within three duty days of the substantiating decision.

(b) Oversee the climate assessment process. Ensure all staff members having equities in the climate survey have access to survey results

for analysis. Draft the Corrective Action Plan (CAP) to address concerns identified in the climate survey report.

(c) Utilize reference (e), published by the Inspector General of the Marine Corps, for ensuring command compliance with reference (a).

(d) Maintain overall cognizance for execution of the policies identified within this Order.

(e) Read and familiarize yourself with the references.

(2) Adjutant

(a) Assist the Equal Opportunity Advisor (EOA) in the generation of correspondence related to PAC as required.

(b) Ensure that records created as a result of this order shall be managed according to the National Archives and Records Administration (NARA) approved dispositions to ensure proper maintenance, use, accessibility, and preservation, regardless of format or medium.

(c) Read and familiarize yourself with the references.

(3) Staff Judge Advocate.

(a) Read and familiarize yourself with the references.

(b) Provide legal advice and guidance to the Installation Commander, supported commanders' and investigating officers on all matters related to command climate and PAC.

(c) Conduct legal sufficiency reviews of all PAC investigations to determine whether any errors or irregularities exist and if so, their legal implications. Advise commanders and investigating officers of appropriate action, as required.

(d) Review all extension requests, on behalf of the Installation Commander, and determine if an extension is warranted. Provide the appropriate documentation to investigating officers for inclusion to the report of investigation.

(e) Review and forward all initial appeals of a supported commanders' decision to the Installation Commander

(4) EOA/Military Equal Opportunity (MEO) Office.

(a) Provide subject matter advice and guidance on all matters related to command climate and PAC. In the event of a change published to reference (a), update the command with all necessary information.

(b) Conduct compliance inspections of supported commanders' prohibited activities and conduct programs, as requested.

(c) Provide monthly updates to the supported GCMCAs to include: unit prohibited activities and conduct training conducted by the EOA/MEO Office; total number of all prohibited activities and conduct reports received; total number of prohibited activities and conduct reports accepted, referred, or dismissed; total number of accepted complaints that were

substantiated, not substantiated, and the means of disposition for all substantiated incidents.

(d) Serve as the survey administrator for MCINCR - MCBQ Defense Equal Opportunity Management Institute (DEOMI) Organizational Climate Survey (DEOCS). Ensure all personnel, administratively assigned within the Command Staff Sections, are afforded an opportunity to participate in the DEOCS. This includes Manpower (G-1 including IPAC), Operations (G-3), Logistics, Installation and Environment, Communications, Performance and External Affairs, Chaplains Office, Command Inspector General's Office, Communication Strategy and Operations Office, Legal Services Support Section, Marine Corps Community Services, Post Office, Regional Contracting Office, Reserve Support Unit, Safety Division, Sexual Assault Prevention and Response Office and the Office of the Staff Judge Advocate.

(e) Perform mediation services to assist in resolving issues at the lowest level, as requested or required.

(f) Advise supported commanders and military personnel on the use of the PAC complaint process to report, resolve, and dispose of complaints alleging prohibited activities and conduct.

(g) Execute the EOA/MEO Office complaint processing actions in accordance with reference (a).

(h) Provide analysis of command-specific data which will enable commanders to monitor command climate within their organization, as requested. Identify trends and areas of concern, and recommend methods for improving the command climate.

(i) Provide briefings or training on command climate issues and prohibited activities and conduct for supported commands, as requested.

(j) Conduct the required Equal Opportunity Representative (EOR) training for supported command EORs.

(k) Track compliance with command climate assessment requirements on behalf of the Commander, supported Commands and Tenant Activities. Provide non-compliance of requirements to the Installation Commander or the next level Commander to ensure appropriate documentation of any negligent or willful failure of compliance to reference (a).

(5) Subordinate and Tenant Activity Commanders.

(a) Screen and appoint an EOR to serve as the command liaison with the servicing EOA/MEO office. For workspaces that are not co-located with the Command nucleus and consist of 50 or more personnel, additional EORs should be appointed from within those spaces to help support and provide required training. See Reference (a) for qualification requirements.

(b) Enclosure (1) is a list of all Commands and Tenant Activities that are required to conduct a DEOCS.

(c) Enclosure (4) is included to assist Commanders with the flow of the complaint process.

(6) Unit Force Preservation Councils.

Screen and monitor personnel involved in PAC allegations for high risk stress related reactions.

(7) Victim and Witness Liaison Officer.

Ensure victims and witnesses involved in PAC allegations are advised of advocacy services and issue the DD Form 2701, as required.

c. Coordinating Instructions. Recommendations concerning this policy are invited and will be submitted to the commander via the COS or EOA.

5. Administration and Logistics.

This order shall be reviewed and reissued within 90 days of assumption of command. Interim changes will be incorporated as necessary.

6. Command and Signal.

a. Command.

(1) This Order cancels all local Military Equal Opportunity (MEO) Standard Operating Procedures to include any existing command policy letters for Equal Opportunity and Hazing.

(2) This Order is applicable to MCINCR-MCBQ and all subordinate commands. This policy will remain in effect until revised or cancelled by appropriate authority.

b. Signal. This Order is effective the date signed.

(1) POC is GySgt Reynolds at (703)432-0764; email: patricia.reynolds@usmc.mil.



W. C. BENTLEY III

Unit Listing

Commander, MCINCR-MCBQ exercises GCMCA for the following organizations

Headquarters and Service Battalion, MCINCR-MCBQ
 Headquarters Company
 Service Company
 Combat Development Company (only those listed below)
 Combat Development and Integration
 Tenant Activities Company (only those listed below)
 Manpower and Reserve Affairs
 Marine Corps Operational Test and Evaluation Activity
 (MCOTEA)

Joint Non-Lethal Weapons Directorate
Security Battalion, MCINCR-MCBQ
Marine Corps Air Facility Quantico
Headquarters and Service Battalion, HQMC, Henderson Hall
Marine Aviation Detachment, Paxtuxent River
 Marine Aviation Detachment, China Lake Point Mugu
Marine Barracks Washington
Marine Corps Embassy Security Group (includes all regions)
Marine Corps Intelligence Activity
Marine Cryptologic Support Battalion (includes all companies)
Marine Helicopter Squadron One (HMX-1)
Wounded Warrior Regiment
 Wounded Warrior Battalion - East
 Wounded Warrior Battalion - West

PROHIBITED ACTIVITIES AND CONDUCT (PAC) PROCEDURES FOR
PREVENTION

1. General

a. The organizational climate is the responsibility of the Commander. Sound leadership is the key to eliminating all forms of prohibited activities and conduct. The achievement of a positive command climate is not dependent solely on the Commander. All individuals in the command must treat one another with dignity and respect.

b. Communication from senior to subordinate, subordinate to senior, military to civilian and civilian to military is essential.

b. There are three major components to the commands prevention strategy. Leadership Support, Command Climate and Training. Together these methods set the stage for appropriate oversight of command climate.

2. Leadership Support. Supervisors and leaders will cultivate a climate and culture of dignity, respect and trust. They will establish the benchmark of appropriate behavior by modeling and incorporating such behaviors into their daily practices. As mentors and guides, they will become the epitome of Marine Corps values to which future leaders can aspire. They will engage in clear communication of expectations and provide transparency within the bounds of privacy to assure their subordinates that the Marine Corps values will be upheld. In addition, supervisors and leaders will encourage reporting of alleged prohibited activities and conduct and inspire confidence by responding to complaints alleging prohibited personnel conduct with impartiality, fairness and urgency.

a. Equal Opportunity Advisor (EOA). An EOA is assigned as Special Staff for MCINCR-MCBQ and is considered the Marine Corps Subject Matter Expert (SME) on command climate and prohibited activities and conduct.

b. Equal Opportunity Representative (EOR). Commanders with more than 50 assigned personnel will appoint an Equal Opportunity Representative to serve as the command liaison with the servicing EOA and as a source of information for Commanders and Complainants.

3. Climate Assessment. Commanding Generals without subordinate O-5/O-6 level commands, all slated O-5/O-6 level commands with more than 50 assigned personnel and any Commanding Officer in an acting status are required to conduct climate assessments.

a. Timeline. Climate assessments will be conducted within 90 days prior to a change of command and will be briefed to the commander assuming command. To the extent practicable, the annual assessment will be completed within 365 days of the ending date of the previous assessment.

b. Assessment Tool. The Defense Equal Opportunity Management Institute (DEOMI) Organizational Climate Survey (DEOCS) will be the only survey used that meets this requirement. The Unit Identification Code (UIC) and/or Reporting Unit Code (RUC) will be used for all DEOCS reports for all commands.

c. Corrective Action Plan (CAP). Designated staff will develop a corrective action plan to address areas of concern identified in the DEOCS report. All climate factors identified in the report as below service

PROHIBITED ACTIVITIES AND CONDUCT PROCEDURES FOR
RESPONSE

1. In accordance with reference (a), Commanders will ensure prompt, impartial, and thorough investigation of all complaints (as determined by the Command Equal Opportunity Advisor (EOA)) to meet prima facie, of prohibited activities and conduct. Commanders are responsible for ensuring all command actions and complaint processing requirements are accomplished. Upon official notification to the Commander that an allegation has been received, commanders have the following options:

a. Dismiss. If the Commander determines that an investigation cannot be undertaken due to any of the reasons identified in reference (a), a justification for the Commander's decision to dismiss the complaint will be documented in the DASH system utilizing Appendix G.

b. Referral. Claims of conduct not under the purview of reference (a) will be referred to the complainant's chain of command or appropriate agency for redress or further assistance. This includes, but is not limited to, claims of sexual assault; offenses governed by other orders or UCMJ, etc. The preferred method of referral will be a positive turnover of the complainant to their chain of command or the appropriate agency.

c. Accept. Commanders will accept a prima facie complaint alleging prohibited activities and conduct for investigation and processing unless the complaint is dismissed or referred for any of the reasons described in reference (a) and mentioned above. The following are the requirements for acceptance:

(1) Within three duty days, make an initial assessment of a complaint through consult with the Command EOA and SJA to determine the proper handling and follow on requirements.

(a) Forward official notification, with a detailed description of the facts and circumstances, to the next superior officer in the chain of command who has General Court Martial Convening Authority (GCMCA).

(b) Submit all reportable information to the EOA/MEO office and direct the supporting EOA to conduct an intake interview, utilizing Appendix A and B, and open an initial discrimination and sexual harassment (DASH) report.

(c) Submit an OPREP-3 SIR Report to the Marine Corps Operations Center (MCOC) in accordance with reference (d) upon the commander's determination to accept the complaint. Note: OPREP-3 SIR is not required, if the commander dismisses the complaint or refers the complaint in accordance with reference (a).

(d) Commence or cause the commencement of the investigation of the alleged prohibited activity and conduct. All inquiries/investigations will be conducted in accordance with reference (a) and reference (c).

(e) Inform the alleged offender that they are the subject of a complaint, the general nature of the allegation against them and that an investigating officer will be conducting a preliminary inquiry or command investigation into the alleged violation. The notification will be documented on Appendix E (Offender Acknowledgement) of reference (a).

PROHIBITED ACTIVITIES AND CONDUCT PROCEDURES FOR
RESPONSE

3. Appeals.

a. Each party to a complaint (the complainant, to the extent one exists, and subject of the complaint, to the extent that they are a uniformed Service member) has the right, within five duty days of receipt of the commander's decision, to appeal the commander's final decision to substantiate or not substantiate an accepted complaint of prohibited activities and conduct. This will be documented on the Appendix C and Appendix E, provided during the commander's notification.

b. Initial Appeal.

(1) Appeals will be submitted to the Marine's (subject or complainant) Equal Opportunity Representative and forwarded to the EOA, for processing.

(2) Appeals must be in writing, utilizing Standard Naval Letter format, and include the relevant references and enclosures. The appeal letter must state the bases of appeal and provide a justification for the bases.

(3) Upon receipt of the Appeal package, the EOA will make the required DASH entry and forward the package to the Staff Judge Advocate's office.

(4) Initial appeal determination will be returned to the Marine within 20 calendar days of receipt of the appeal. Reference (a) lists the different actions that may occur during this stage of the appeal.

(5) The appellant will be provided a copy of the GCMCA decision and will provide an endorsement stating the information was received and the date received.

c. Final Appeal. The Secretary of the Navy (SECNAV) or designee, is the final appellate authority.

(1) Final appeal must be submitted within 30 calendar days and contain an endorsement from the appellant's commanding officer and the GCMCA who conducted the initial appeal.

(2) The appeal will then be routed via the Office of the Judge Advocate to CMC, for final review.

(3) Upon completion of final appeal, the appellant will be provided a copy of the SECNAV decision and will provide an endorsement stating the information was received and the date received.

4. Closure of Case File. Commanders will request administrative closure of the associated DASH case file, utilizing Appendix I, upon completion of all required Appendices, notifications, appeals and disposition actions.

5. Reprisal Prevention and Response. Personnel that have engaged in the complaint process shall be protected against reprisal. Personnel are encouraged to inform leadership of any actions, real or perceived, as reprisal. Any member who reprises against a member for filing a complaint

Commander's DEOCS Checklist and Tracking

Defense Equal Opportunity Management Institute (DEOMI) Organizational
Climate Survey (DEOCS) Requirements
MCINCR-MCBQO 5354.1E

Required Surveys

_____ 90 days prior to departure (Outgoing Commander)

_____ Within 365 days of previous (All Commanders)

Prior to Requesting Survey

_____ Establish Intent and publish to all personnel

_____ Appoint Survey Administrator in writing

_____ Provide accurate personnel (Uniformed and Civilian)
accountability, administratively assigned to Survey
administrator

_____ Gather all Information required to request survey

During the Survey

_____ Publicly endorse the assessment process

After the Survey

_____ Survey Administrator should request the report

_____ Review Survey

_____ If needed, have the EOR/EOA conduct interviews or focus
groups for clarity

_____ If needed, review records and reports to determine
validity of information

Corrective Action

_____ Develop a Corrective Action Plan

_____ Share DEOCS results with all members of the organization

_____ Solicit input for ways to improve areas of concern

_____ Provide CAP to next higher level commander for review and
approval within 30 calendar days of Report date

During the Survey

_____ Review survey results and CAP progress with Incoming
Commander

Important Links:

Survey Administrator Website: https://www.deocs.net/login/login_Local.cfm

Step-by-Step Instructions: <https://www.deocs.net/public/index.cfm>

DASH Case Number _____

Dates for Updates to the DASH (Discrimination and Sexual Harassment Database Updates)

CA Notified of Complaint	_____	Appendix F (Report of Disposition)	_____
OPREP-3SIR	_____	Appendix E (Offender Acknowledge Final Signatures)	_____
Appendix A (Complainant's Rights and Responsibilities)	_____	Appendix C (Complainant Acknowledge 3 Signatures)	_____
Appendix B (EOA Complaint Analysis)	_____	Appeal	_____
IO Appointment	_____	Appeal Determination	_____
Appendix E (Offender Acknowledge 1st Signature)	_____	Appendix I (Administrative Closure of DASH)	_____
Appendix D (Notification of Acceptance)	_____	Additional Remarks (Referral to NCLIS, Warm Hand Off to Chain of Command, etc)	_____
GCMCA Notification	_____		_____
IO Submit to EOA for Review	_____		_____
EOA Review Complete	_____		_____
IO Submit to SJA for Review	_____		_____
Legal Review Complete	_____		_____
Report of Inves Complete	_____		_____
Extension Request	_____		_____
Extension Approval	_____		_____
Appendix H (Signs of Final Command Investigation)	_____	Appendix G (Notification of Dismissal)	_____

Within 3 Duty Days of CA Notification

Within 3 Duty Days of CA Determination

Conducted by the EOA

Initial - GCMCA Final - SECNAV

Required to Close DASH

Requires GCMCA Approval ONLY

30 Days (SI - 14 Days)

Provide copies of all documents to the EOA upon completion to ensure appropriate submission in DASH