



INSTITUTE FOR DEFENSE ANALYSES

**Using the *Integrated Case Reporting System*
for Research on Sexual Harassment**

Alexis A. Pang
John W. Dennis
Amy A. Alrich
Emily A. Fedele

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For More Information

Alexis A. Pang, Project Leader
apang@ida.org, 703-845-2054

Leonard J. Buckley, Director, Science and Technology Division
lbuckley@ida.org, 703-578-2800

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Executive Summary

The Integrated Case Reporting System (ICRS) is a database used by the U.S. Army to store information on reported incidents, or “complaints,” of sexual harassment. The Army created ICRS in 2011 to house information on both sexual harassment and sexual assault. However, following the Army’s adoption of the Department of Defense (DoD) Sexual Assault Incident Database (DSAID) in October 2013, ICRS shifted to focus exclusively on sexual harassment. ICRS was and continues to be managed by a team affiliated with the U.S. Army’s Sexual Harassment/Assault Response and Prevention Program (SHARP).

The Army Resilience Directorate (ARD) tasked the Institute for Defense Analyses (IDA) with assessing the feasibility of using data from ICRS to conduct research on the U.S. Army’s accountability system for handling sexual harassment complaints. In response, IDA examined a de-identified copy of ICRS (2011–2020) to understand the scope, breadth, and robustness of its contents. To learn how the accountability system ought to work, in principle, IDA also reviewed policy documents from the DoD and Army that prescribe authorities, procedures, and guidelines for handling sexual harassment complaints. To put findings into context, IDA also engaged subject matter experts (SMEs) from the SHARP community to learn how the complaint process ultimately operates in practice.

The purpose of this document is to summarize IDA’s findings into a document for future analysts. Each section introduces one or more of ICRS’ features and then offers lessons learned from IDA’s assessment. The goal is to familiarize analysts with the nuances of identifying and interpreting ICRS’ contents so they may effectively navigate any research they are pursuing.

IDA’s assessment found that ICRS provides a good starting point for analysts seeking to understand the sexual harassment complaint process used by the U.S. Army, as it contains information on a variety of cases. Should there be interest in increasing ICRS’ analytic value, IDA offers recommendations on how its features and use may be adapted to better meet these needs. Recommendations should be viewed as ideas on how to transition ICRS into more of an analytic tool, rather than critiques, since ICRS is not primarily intended to serve research purposes.

1. Ensure ICRS contains complete complaint records. One of the main challenges to using ICRS for research is the number of variables with missing data. IDA’s exploratory

analysis revealed that most of the date-oriented variables and many of the demographic variables contain numerous missing values. Missing values undermine analysis efforts because a lack of information makes it harder to reliably identify patterns. As an example, one would be unable to examine whether Soldiers of certain races were more or less likely to seek help if a large number of records had blanks listed under *Complainant's Race*.

SMEs pointed toward several factors contributing to the number of missing values. First, there is greater emphasis on maintaining sexual assault records in DSAID than there is on maintaining sexual harassment records in ICRS. Second, there are inconsistencies around whether and to what extent certain types of sexual harassment complaints (informal and anonymous) are entered into ICRS at all, which makes it difficult to gain a comprehensive understanding of prevalence. Lastly, the people responsible for populating ICRS, the Sexual Assault Response Coordinators (SARCs), have very few technological and procedural guidelines to help them know which fields should be populated at any given point in the accountability process.

2. Increase clarity around how variables should be used. The assessment revealed inconsistencies in how SARCs use the data entry fields that are available to them. There was a lot of variation in how people input dates for procedural milestones, leading to situations in which the complaint process appears to occur out of order. The fact that a complainant may or may not be the same person as the victim also appears to have created some challenges. IDA's exploratory analysis found cases in which the demographic and background information for complainants were, instead, those of the victim. ICRS does not contain a separate set of fields to describe the victim's characteristics, which may contribute to some of the confusion about whether the complainant's or the victim's information should be entered. Information about locations likewise varied in how it was input, particularly in situations where one or more parties (i.e., complainant, alleged offender, or SARC) relocated to a different base before the complaint was resolved.

SMEs suggested that some of the variation may result from the relatively little guidance that SARCs receive on how to select information for each variable. While SARCs receive a training manual about the data entry process, there may be lingering questions about how to handle unusual situations or changes over time. Other inconsistencies may, as it were, stem from the guidance they do receive. SMEs recounted how SARCs are expected to assign demographic attributes differently for complainants and alleged offenders. SARCs are to assign the *Complainant's Grade/Rank* based on the complainant's rank and grade when the complaint was filed. Differently, they are asked to assign the *Alleged Offender # Grade/Rank* based on the rank and grade that the alleged offender held at the time of the incident. Since each attributional task uses a different underlying logic—complainants at time of filing and alleged offenders at the time of the incident—it would not be difficult for someone to make a mistake during data entry. More broadly, different underlying logics also prevent analysts from testing whether different types of

complainant-offender combinations (e.g., enlisted-officer) impact any aspect of the accountability process (e.g., the likelihood of an investigation).

Inconsistencies in how variables are used create other analytic challenges, as well. If SARCs use different approaches to populate the same variable (e.g., *Reported Date*), analysts cannot reliably conceptualize what that variable represents from a practical standpoint. If seemingly similar variables (e.g., demographics) are populated using different underlying logics, analysts will also struggle to gain a complete operating picture of a given incident.

3. Revisit ICRS technologies. From a technological standpoint, ICRS is currently structured in a way that makes it more difficult to obtain accurate and complete records about sexual harassment complaints. It would be worth revisiting these technologies to see if they can be enhanced to better support informational requirements.

First, ICRS would benefit from technological features that support data integrity. At present, ICRS does not check whether important fields have been populated (rather than left blank) before saving. This unnecessarily puts the onus of knowing which fields need to be populated in a given moment on the SARCs. IDA recommends working with SARCs and other stakeholders to identify which fields should be mandatory at a given stage of the process and then adding corresponding checks to the data entry screen.

ICRS would also benefit from becoming better aligned with the phenomena it is intended to capture. Currently, ICRS only allows for one complainant per record, which may not always fit the incident being documented. As an example, if an incident involved multiple victims that wished to report, they would each have to file separate complaints. ICRS would then contain multiple records for the same incident, which makes it more difficult to count the number of reported incidents in a given year. ICRS also does not offer a way of linking however many records may stem from the same incident, which makes it harder to quickly obtain a complete operating picture of what happened.

ICRS could also be enhanced to capture routine changes over time. The underlying logic behind how ICRS currently stores information is to preserve one snapshot of a given complaint. As such, updating records overwrites what was previously saved, rather than storing both pieces of information. Were ICRS solely used to capture information about one time point (e.g., the day of the alleged incident), a single snapshot logic would work well. However, ICRS is used to document how complaints progress through the accountability system, which involves multiple steps and a greater expanse of time. As such, it would be worth revisiting ICRS' setup to see if it could better accommodate events that happen after the initial complaint is filed. Location histories, for example, are currently not kept by ICRS. Since Soldiers and SARCs routinely relocate to new stations and units, ICRS would benefit from the ability to receive data on multiple locations per individual. Alternatively, ICRS could provide a single snapshot on the front end, but store version-

control information on the backend. The latter approach would involve modifying the front end so SARCs could explain why they changed variables that already contained information. The system could then store a copy of the previous snapshot; SARCs' comments; and a log of which variable(s) were changed, by whom, and when.

4. Acknowledge fundamental limitations of the complaint documentation process. The first three recommendations provide actionable ideas on how to enhance the integrity and analytic value of ICRS' holdings. In this last point, IDA would like to acknowledge that certain aspects of the complaint documentation process may be harder to change.

First and foremost, it is critical to remember that SARCs are only able to populate ICRS with the information that they receive. If a victim chooses to not report or if a complainant cannot provide all the details of what happened, it would be unfair to hold the SARC responsible for incomplete records. Similarly, since there is little guidance around whether and how often Commanders should update SARCs on any actions taken to address allegations, SARCs are not always privy to the information they need to populate case records.

IDA would also like to acknowledge that ICRS may contain seemingly inaccurate or contradictory information that, in fact, accurately reflects real-world possibilities. IDA's assessment revealed a number of incidents that were judged as "unsubstantiated" yet resulted in some type of disciplinary action for the alleged offender. While this may seem logically incorrect, it accurately reflects situations in which Commanders use their discretionary authority to take disciplinary actions in an effort to promote social order.

Lastly, IDA would like to acknowledge the fact that ICRS was not designed as a research database. The way in which ICRS does not separate information about the "complainant" from the "victim" may make it difficult for researchers to examine what types of people are being victimized and who chooses to report. However, the setup correctly honors an important reason why the victim's information might not be input into ICRS: victims retain the right to not be identified, if they wish, and to instead have someone report anonymously on their behalf. These seeming misalignments illustrate why it is challenging to use the same dataset for multiple purposes. While not impossible, these types of scenarios highlight the complexities that must be taken into consideration when either designing or updating systems that will be used in multiple ways.

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1. Introduction

The Army Resilience Directorate (ARD) tasked IDA with assessing the feasibility of using data from the Integrated Case Reporting System (ICRS) to conduct research on the U.S. Army's accountability system for handling sexual harassment complaints. In response, IDA examined a de-identified copy of ICRS to understand the scope, breadth, and robustness of its contents. The copy IDA received contained information about the 6,043 complaints logged between January 2011 to July 2020. There were 426 variables, 103 of which marked key milestones in the accountability process for handling sexual harassment complaints. None of the variables in the dataset contained unstructured textual information.

To learn how the accountability system ought to work, in principle, IDA also reviewed any policy documents from the Department of Defense (DoD) and the Army that prescribe authorities, procedures, and guidelines for handling sexual harassment complaints. To put findings into context, IDA also engaged subject matter experts (SMEs) to understand how the complaint process ultimately operates in practice.

The purpose of this document is to summarize IDA's findings into a primer on ICRS for future analysts. Each section introduces one or more ICRS features, followed by lessons learned from IDA's assessment. The goal of this approach is to familiarize analysts with the nuances of identifying and interpreting ICRS' contents so they may effectively navigate any research they are pursuing. The document begins with an overview of ICRS' purpose, holdings, and data entry process. The next section explores specific variables in greater detail, starting with variables that describe incidents and finishing with variables used to document the accountability process. The document concludes by providing recommendations on how to increase ICRS' analytic use value, along with a discussion of important things to remember when considering possible modifications. These recommendations should be viewed as options for transitioning ICRS into more of an analytic tool, rather than critiques, since ICRS was not created to serve research purposes.

2. The Integrated Case Reporting System

A. History and Purpose

ICRS is a database used to collect information on reported incidents, or “complaints” of sexual harassment either by or against Soldiers. The Army created ICRS in 2011 to house information on both sexual harassment and sexual assault. Following the Army’s adoption of the DoD Sexual Assault Incident Database (DSAID) in October 2013 (SMEs interview, 10/15/2020), the use of ICRS shifted to focus on sexual harassment exclusively. ICRS was and continues to be managed by a team affiliated with the U.S. Army’s Sexual Harassment/Assault Response and Prevention Program (SHARP).

Each entry (i.e., row) in ICRS refers to one sexual misconduct record (forthwith “case”). When exploring ICRS’ records, it is important to keep several things in mind. First, while most entries between 2011 and 2020 document sexual harassment incidents, there are also some sexual assault cases in ICRS. In part, this is an historical reflection of evolving documentation practices. As mentioned above, the Army used ICRS for both sexual assault and sexual harassment records until the adoption of DSAID in 2013 (SMEs interview, 10/15/2020).

Second, it is important to understand that ICRS does not document *all* sexual harassment incidents (i.e., prevalence) in the Army. Sexual harassment remains significantly underreported among military Service members (Breslin et al. 2019; Davis et al. 2017; Pershing 2003; Wolff and Mills 2016). Also, while ICRS primarily includes records on sexual harassment incidents either by or against Soldiers, it also contains records with complainants from other Services. This could happen if an Army Sexual Assault Response Coordinator (SARC), the person who inputs data into ICRS, documents an incident either for or against someone from another Service; for example, on a joint base (SMEs email, 9/10/2021). In sum, since ICRS neither completely nor exclusively contains information about sexual harassment incidents in the Army, ICRS should not be used to estimate prevalence.

Lastly, it is important to understand that ICRS also does not document all *reported* incidents of sexual harassment in the Army. While ICRS was designed to accept information on all types of sexual harassment complaints—anonymous, informal, and formal—exploratory analysis revealed that the majority of ICRS entries (59%) represent formal complaints. SMEs (10/15/2020) confirmed IDA’s observation and offered several ideas as to why.

One of the reasons most ICRS records may be formal complaints is because informal complaints are typically handled internally, by the command team. In these situations, the complaint is unlikely to reach the people who input data into ICRS, the SARCs. Moreover, even if an informal complaint reaches a SARC, the incident may not be documented in ICRS.

Another reason ICRS may predominantly have formal complaints is because informal and anonymous complaints are typically documented through a different mechanism. Structurally, ICRS closely mirrors DA Form 7746 (Department of Defense [DoD] 2020), a form that SARCs use for collecting information about formal and anonymous complaints. However, most informal and anonymous complaints are documented using a Memorandum for Record (MFR), which does not involve the same level of detail and structure.¹ SMEs (10/15/2020) noted that there is no system for collecting and storing MFRs into a centralized database, whether in ICRS or elsewhere, so it is unclear what percentage of sexual harassment incidents are documented as MFRs, rather than as ICRS complaints. SARCs retain the option of creating records in ICRS to log any informal and anonymous complaints that they have received, but this is not consistently done in practice (SMEs interview, 10/15/2020).

The way ICRS handles updates may also play a role. It is possible for an informal or anonymous complaint to be converted into a formal complaint (SMEs email, 9/10/2021). Conversions may happen for a variety of reasons. A complainant may request an anonymous complaint to be escalated into a formal complaint for any reason (e.g., after experiencing multiple related incidents). A Commander could also escalate an informal complaint into a formal complaint (e.g., after receiving multiple informal complaints about the same alleged offender). Anonymous complaints could also be converted if the Commander felt there was enough information to elevate the issue to a formal complaint (DA 2020, pg. 107). Regardless of why the conversion happened, ICRS overwrites the initial complaint record with the updated information, rather than keeping multiple records for the same incident. Since informal and anonymous complaints can be converted into formal complaints, but not the other way around, it is possible for ICRS to include a disproportionate number of formal complaints relative to the types of complaints that SARCs actually received. That said, SMEs (3/22/2022) estimate that the conversion rate is less than 1%, so conversions are unlikely to be a primary driver.

Per SMEs (9/10/2021), ICRS does not include a place for SARCs to systematically document any conversions that may have occurred. To some degree, converted records can

¹ Per Army Regulations, “The Memorandum for Record should contain the following information, if available: date and time the information was received; a detailed description of the facts and circumstances included in the complaint; date and time the complaint was resolved and by whom; any other pertinent information; and signed by the commander” (Department of the Army [DA] 2020, paragraph 7-8).

be identified through the last four digits of the *Case Number*. Informal complaints are marked with the code “IRAR,” formal complaints use “FRAR,” and converted complaints use “IFAR.” Otherwise, most updated fields simply overwrite the previous record (SMEs interview, 9/23/2021). The only field that remains the same after a conversion is the *Case Report Date*.

B. How the Dataset is Populated

SARCs are responsible for inputting data into ICRS (DA 2020). The SARC creates a new record in ICRS after collecting information about an alleged incident from the complainant. Over time, as the complaint progresses through the accountability process, the SARC returns to ICRS to update the record with any additional information.

It is important to understand that sexual harassment complaint records vary widely when it comes to the completeness of information. One of the reasons for this is structural. In 2013, Congress mandated an annual report on sexual harassment in the National Defense Authorization Act (United States 2013). In response, ICRS was updated to capture additional data elements that would allow the Army to meet the new reporting requirement.² Because of this update, some of the missing data prior to 2013 may reflect the fact that ICRS, at the time, had fewer data entry fields for collecting information about the incident.

Another potential reason why ICRS has a lot of missing data is because the data entry process is largely unregulated. According to SMEs (9/23/2021), there are no policies regarding which specific pieces of information should be input and when. There are also no policies around when and how often SARCs should update ICRS records to document the complaint’s progression through the accountability process. In addition to the absence of policy, there are few technological checks on the completeness of information (SMEs interview, 9/23/2021). While SARCs are required to enter *Nature of Complaint*, *Requested Remedy*, and *Category of Harassment* in order to create a record, all other data entry fields are optional when either creating or updating records (SMEs email, 3/22/2022). It is also worth noting that all possible fields appear at all times on the data entry screen, regardless of their relevance for a given stage of the accountability process. Such conditions increase the level of difficulty for SARCs in terms of knowing which fields they should be ensuring are populated each time they return to ICRS to update a given record.

Robustness may also vary due to differences in how each type of complaint is input into ICRS. As discussed above, informal complaint records may be particularly thin since they are typically captured using MFRs, which require less information. Likewise, even

² The addition of new data elements may have contributed to the variability as regards data entry. Human Resource Business Council (27 February 2018), 1-2 Star Executive Steering Committee (ESC), <https://www.milsuite.mil/book/docs/DOC-554681>.

though anonymous complaints could, in principle, be captured using DA Form 7746, in practice they are usually documented using MFRs.

Differences in data robustness extend past the record creation stage, as well. As complaints progress through the accountability system, there are no procedures for keeping SARCs up-to-date on how informal and anonymous complaints are being handled (SMEs interview, 9/23/2021). For example, informal complaint records typically do not contain information about whether there was an investigation, disciplinary action, and so forth, since SARCs are not privy to discretionary actions undertaken by the Commander.

While there are few guidelines to support and guide the data entry process, there are several mechanisms that monitor data robustness and report gaps. SARCs receive a monthly quality control report that reminds them to address any missing fields (SMEs email, 9/10/2021). There is also an annual push to revisit, check, and revise both ICRS and DSAID records to promote data integrity. To date, the annual push has particularly emphasized DSAID record upkeep, so it is unclear whether and to what extent ICRS records are likewise remedied by the process (SMEs interview, 9/23/2021).

3. ICRS Variables

There were 426 “variables” (i.e., columns) in the copy of the ICRS dataset that the sponsor provided to IDA in July 2020. Variables may be broken into two categories or groups.

1. Variables that help describe the incident. This includes information about the people involved (i.e., the complainant and one or more offenders), the event (e.g., the type of harassment, location).
2. Variables that document how the complaint record progressed through the Army’s accountability system.

Below, we discuss both categories and offer lessons learned on particular variables therein.

A. Incident-Level Variables

Incident-level variables document the particulars of each incident recorded in ICRS—who was involved, what happened, and so forth. Below we discuss lessons learned about three subsets of incident-related data: complainant, alleged offender, and event.

1. Complainant

In ICRS, a “complainant” is the person who reported the incident of sexual harassment to the SARC by filing some type of complaint (formal, informal, anonymous). At present, ICRS can only accommodate one complainant per case record, even if multiple victims were involved.

ICRS captures information about complainants using several variables, including: *Complainant's Age, Complainant's Gender, Complainant's Ethnicity, Complainant's Race, Complainant's Service, Complainant's Component (Army only), Complainant's Grade/Rank, Complainant's UIC [Unit Identification Code], Complainant's Commander Name*, and so forth.

It is critical to understand that the complainant is not necessarily the same person as the victim. Since anyone can file a complaint—the victim, the victim’s friend, a family member, a bystander, a commander—the “complainant” could be anyone who either experienced, witnessed, or heard about the event (SMEs interview, 9/23/2021). For example, if a Commander filed or elevated (from informal to formal) a complaint on behalf of a Soldier under their care that was victimized (DA 2020, section 7-8 Sexual Harassment

Complaint Processing System, n-3-b), the complainant-related variables would contain information about the Commander rather than the victim (SMEs email, 9/10/2021).

All that said, SMEs (9/10/2021) also communicated that some SARCs may collect information about the victim from a non-victim complainant and then input the victim's information into the complainant-oriented fields of ICRS. SMEs did not have insight into how often this occurs. IDA likewise observed 52 cases in which the *Complainant's Age* was between 0 and 16 years old, yet the individual was somehow also a member of the military (*Complainant's Personnel Category* = "Military," rather than "Military Dependent"). It is unclear whether these cases reflect exceptional situations, data entry errors, or SARCs assigning some fields based on the victim and other fields based on the complainant.

To date, there is no straightforward way to determine whether a complainant is the same person as the victim. As such, IDA would not advise using complainant-oriented data for a victim-centered analysis. SMEs (9/23/2021) suggested there may be some clues in the free-text fields SARCs use on the data entry screen; however, this unstructured information is not saved in the main ICRS dataset. It is unclear whether and where the free-text information is stored. IDA did not receive a copy of the information input into free-text fields, so cannot comment on whether it would be a consistent source of insight about the complainant's relationship to the incident.

2. Alleged Offender(s)

The person or persons whom the complainant accuses of doing some type of sexual misconduct is known as the "alleged offender." ICRS has the ability to accommodate information for up to 10 alleged offenders.

ICRS captures information about each (up to 10) alleged offender(s), with variables labeled by the alleged offender's corresponding number. For example, the variables that describe the first alleged offender include: *Alleged Offender 1 Age*, *Alleged Offender 1 Personnel Category*, *Alleged Offender 1 Service*, *Alleged Offender 1 Grade/Rank*, *Alleged Offender 1 Relationship to Complainant*, *Alleged Offender 1 Military Relationship to Complainant*, *Alleged Offender 1 Recruit/Training Status*, and so forth. Likewise, the variables used to capture information about the second alleged offender from an incident would be labeled with the number 2. Going forward, for simplicity's sake, we will describe all 10 similarly named variables using broader terms (e.g., *Alleged Offender #*). IDA's assessment found that 95.2% of formal complaint records include only one alleged offender. It is unclear whether the overwhelming number of single-offender complaint records reflects the incidents complainants described or inconsistencies in how data were entered into ICRS (SMEs interview, 9/23/2021).

IDA also learned that there are many instances in which the alleged offender's name would not be input into ICRS. For example, sometimes the complainant does not know the name of the person who sexually harassed them. To accommodate these situations, ICRS allows SARCs to input "Unknown" in the free-text fields for each alleged offender's *Last Name* and *First Name* (SMEs email, 9/10/2021). SARCs may also leave these variables blank, since the system does not require this field to be populated (SMEs interview, 9/23/2021). IDA also observed a number of missing values for other alleged offender variables. Similar to the above, ICRS accommodates this scenario by allowing SARCs to select "Unknown" from the dropdown menus used for the following variables: *Alleged Offender # ID Type*, *Alleged Offender # Gender*, *Alleged Offender # Personnel Category*, *Alleged Offender # Marital Status*, *Alleged Offender # Race*, *Alleged Offender # Ethnicity*, *Alleged Offender # Incident Occurred*, and *Alleged Offender # Relationship to Complainant* (SMEs email, 9/10/2021).

3. Reported Behaviors

ICRS offers three variables for documenting the harassing behavior or behaviors for each incident.

First, *Incident Details* is used to note whether the incident that the complainant recounted was a "single" event or part of "multiple" related events. ICRS also offers a *Category of Harassment* variable, which provides a detailed description of the types of behaviors that allegedly occurred. Since this variable is used to capture detail, there are a large number of possible values (34 categories). Possible values are grouped using the same categories of sexual harassment found in AR 600-20 (DA 2020): verbal, physical contact, and nonverbal. A few examples of *Category of Harassment's* possible values include: "Sexual jokes (Verbal)," "Terms of Endearment (Verbal)," "Indecent Exposure (Nonverbal)," "Staring 'Undressing with eyes' (Nonverbal)," and "Sending sexually oriented (notes, letters, faxes, email) (Nonverbal)." Unlike most of the other variables in ICRS, *Category of Harassment* can accept multiple values per variable. For example, complainant #4 could report both "Sexual jokes (Verbal)" and "Indecent Exposure (Nonverbal)" as part of a single incident. Consequently, IDA recommends parsing behaviors before using this variable for analysis.

Lastly, ICRS offers a variable called *Harassed Type* to capture reported behaviors. This variable allows SARCs to align the harassing behaviors documented in *Category of Harassment* within the higher level of harassment categories indicated by AR 600-20 (DA 2020). *Harassed Type* also offers the ability to indicate whether one or more reported behaviors would qualify for Uniform Code of Military Justice (UCMJ) charges and, if so, which one (e.g., "Article 117-Intimate Images"). In the copy of the dataset shared with IDA, the most common value for this variable was "hostile work environment."

Unfortunately, ICRS does not offer a variable for documenting the location of the incident. However, there are other location variables that may offer clues. For example, *Complainant's UIC*, *Alleged Offender # UIC*, and *SARC Location Code* all contain some type of UIC, which may help analysts identify the installation on which the incident occurred. There is also a variable called *SARC Location Name*, which provides the name of the installation associated with the *SARC Location Code*. Should analysts wish to use UICs to identify locations, they should keep a few things in mind.

First, the location variables are oriented around indicating where the complainant, alleged offender(s), and SARC were at the time when the complaint was recorded in ICRS. This location may or may not correspond to where the sexual harassment incident reportedly happened. For example, if someone experiences sexual harassment on a deployment and then reports it after returning to the garrison, the *Complainant's UIC* would correspond to the garrison location, even though the harassment happened elsewhere. Similarly, the *SARC Location Code* and *Alleged Offender # UIC* correspond to where the individuals were when the complaint was filed.

Second, locations associated with a given case could change over time. For example, if one SARC transfers a case to another SARC, the *SARC Location Code* may or may not be updated to reflect the new SARC's location at the time of the transfer. Similarly, if the complainant and/or alleged offender(s) undergo a Permanent Change of Station (PCS) while the complaint is still open, their respective UICs may or may not be updated to reflect the new locations.

Lastly, it is worth noting that updates to location variables overwrite the previous information (rather than saving both versions), which makes it impossible to identify whether SARCs, complainants, or alleged offender(s) physically relocated at any time that the complaint was still open. It is also unclear whether and how consistently records are updated to reflect cases being transferred between SARCs, since there are no guidelines around updating location records (SMEs interview, 9/23/2021). SMEs (9/23/2021) indicated that transferring a case across installations requires a higher approval authority than transferring within an installation, suggesting installation-level location information may be more accurate than location information at lower levels (e.g., between brigades on the same installation). However, there are no records in ICRS to verify either way. Given these various ambiguities, IDA recommends caution when interpreting location variables during analysis.

B. Accountability Process Variables

ICRS is also used to document procedural information related to the accountability process for addressing sexual harassment cases.

1. Authorities

Authorities may be understood as individuals with integral roles in advancing sexual harassment cases through reporting, investigative, adjudicative, and disciplinary processes. ICRS captures information for three authorities: the SARC, the complainant's Commander, and the alleged offender's Commander.

SARC Name documents the name of the person who currently oversees the case. Since SARCs receive and document the complainant's allegations, in many cases the *SARC Name* would also refer to the person who created the ICRS record. However, the SARC assigned to a given case may change over time, so it may be someone different. For example, if the initial SARC leaves the Army or the complainant moves to a new installation, the *SARC Name* would be updated to reflect the name of the new SARC assigned. All that said, SMEs (9/23/2021) cautioned that it is unclear whether and how consistently *SARC Name* is updated to reflect case transfers.

ICRS also contains information about Commanders involved with various aspects of the accountability process. To document information about the complainant's Commander, ICRS has fields for the *Complainant's Commander Name* and the *Complainant's Commander Service*. ICRS likewise documents the name and Service for each alleged offender's Commander.

2. Milestones

Army Regulation 600-20 (DA 2020) outlines the accountability process for handling sexual harassment complaints, to include how cases should be documented, investigated, and resolved. Of the 426 variables in ICRS, 103 denote dates (e.g., *Reported Date*, *Created Date*, *Incident Date*, *Follow Up Assessment Initiated Date*) in this process. We refer to process-specific date variables as "milestones" since they document when complaints complete an important step in the accountability process. IDA examined the possibility of using milestone variables to analyze how cases progress through the accountability process. Unfortunately, IDA found that a process-oriented analysis would be challenging for several reasons.

First, milestone variables are missing a lot of data. Among formal complaint records, for example, only 29 out of the 103 milestone variables contained enough data (100 or more recorded values) for some type of analysis.

Second, IDA noted several types of situations that raise questions about the accuracy of dates. Specifically, many dates were in an order that was inconsistent with formal policies. To give an example, the *Reported Date* is supposed to reflect the date the complaint was reported to a SARC. When logging the complaint into ICRS, if the SARC does not manually input the correct *Reported Date*, ICRS will automatically assign the date the record was created (SMEs email, 9/10/2021). This approach works well when SARCs

input complaints on the same day that they were received. However, if the SARC backlogs a case after subsequent accountability steps have occurred and does not manually input the correct *Reported Date*, milestones will end up out of order. To this end, IDA observed cases in which the *Date of General Court Martial Convening Authority Notified* and the *Complainant's Commander Date Notified* were documented as occurring before the case was reported at all (i.e., the *Reported Date*). Similarly, IDA found cases in which the *Incident Date* occurred after the *Reported Date*, which seems unlikely, if not impossible.

Between missing data and records whose time intervals do not align with those prescribed by policy, IDA recommends caution when considering milestones for some type of analysis.

3. Resolutions

Formal complaints are investigated using a process outlined by *Army Regulation 15-6: Procedures for Administrative Investigations and Boards of Officers*. After compiling and synthesizing information about the facts and circumstances surrounding a sexual harassment complaint, the Investigating Officer communicates findings and recommendations to the Commander. The Commander reviews the case and then forms a resolution for each alleged offender.

Broadly speaking, resolutions may be thought of as the final step or outcome of the accountability process. ICRS contains several related variables, including: *Alleged Offender # Investigating Officer's Findings*, *Alleged Offender # Commander Concur/Non Concur*, *Alleged Offender # Command Decision*, and *Alleged Offender # Disposition*. It is important to understand that, different from many other aspects of the accountability process, resolutions occur on an alleged-offender basis, rather than on the complaint-level. In other words, the complaint does not have a holistic resolution; instead, culpability and any resulting disciplinary actions are decided separately for each individual involved. Accordingly, ICRS has separate resolution variables for each alleged offender involved in a complaint.

The *Alleged Offender # Commander Decision* variables document whether, after reviewing the case, the Commander found the sexual harassment complaint to be substantiated for each alleged offender. For example, *Alleged Offender 3 Commander Decision* indicates whether the Commander decided that the complaint against the third alleged offender was substantiated or not by findings from the investigation. SARCs input Commanders' decisions using a dropdown menu with the following options: "Substantiated," "Unsubstantiated," and "Pending." Exploratory analysis revealed that all *Alleged Offender # Commander Decision* variables have a large number of missing values, which makes it difficult to conduct a substantive analysis of decisions and any case-level factors that may be associated with them (e.g., whether certain types of harassment are more likely to be substantiated than others).

The *Alleged Offender # Disposition* variables document any disciplinary actions or next steps assigned to alleged offenders at the end of the complaint process. Like decision-oriented variables, dispositions are recorded for each alleged offender in a given complaint. SARC's input dispositions by selecting one or more appropriate options from a list that includes: "Adverse or administration actions"; "Article 15—Non-Judicial Punishment—Company Grade"; "Discharge in lieu of court-martial"; "Command Action Precluded"; and more. There is also a free-text box for SARC's to input comments about the disposition (SMEs interview, 9/23/2021). IDA did not observe any free-text in the copy of ICRS provided, so cannot speak to the types of comments recorded.

While *Alleged Offender # Decision* and *Alleged Offender # Disposition* are conceptually linked, they are not necessarily linked in practice. For example, one might anticipate that any complaint found to be "substantiated" (under *Alleged Offender # Decision*) would also have some type of discipline-oriented disposition. However, IDA's exploratory analysis of 6,043 case records revealed 171 formal complaints in which *Alleged Offender # Decision* = "Substantiated," yet *Alleged Offender # Disposition* = "Pending or No Action Taken." Apart from situations in which the disciplinary action was still forthcoming, it is unclear how this combination could occur. IDA examined the possibility that these complaints were more recent, so perhaps the disciplinary actions were still in process. However, only 27 of the substantiated complaints with no disciplinary actions occurred in the most recent year of the dataset copy (i.e., 2020), whereas the remaining (144 complaints) occurred between 2014 and 2019.

IDA also observed the opposite scenario—i.e., "unsubstantiated" complaints that resulted in some form of disciplinary action for the alleged offender. In response to IDA's inquiry about what may lead to this combination, SMEs (9/10/2021) posed that an unsubstantiated complaint could nevertheless result in an adverse disposition if the Commander decided to "impose an administrative action to maintain good order and discipline." In other words, such circumstances may reflect Commanders implementing various informal actions to promote a productive and safe unit culture for their Soldiers. While IDA appreciates this point, it would be worth monitoring ICRS for unsubstantiated complaints that result in disciplinary actions. Should this type of combination grow more prevalent, it may signal friction between unit needs and policy requirements.

4. Conclusion and Recommendations

After reviewing the scope, breadth, and robustness of ICRS' contents, IDA concluded that ICRS is a useful starting point for exploring the sexual harassment complaint process. In this section, we address some of the broader themes underlying the analytic challenges raised in the previous sections. We also provide recommendations on how ICRS may be improved to increase analytic feasibility for the future. Given that the Army did not create ICRS to serve research purposes, IDA's recommendations should be viewed as options for transitioning ICRS into more of an analytic tool, rather than as critiques.

A. Ensure ICRS contains complete complaint records.

One of the main challenges to using ICRS for analysis is the number of variables with missing data. Most of the milestone variables (72%), for example, had fewer than 100 (out of 6,043) case records with available information. A significant number of demographic variables for complainants and alleged offenders were also missing information. Missing data make it difficult to conduct an analysis because there is not enough information to reliably identify any significant differences or patterns. As an example, it would be difficult to test if there are more complainants with certain racial backgrounds if a large number of records left *Complainant's Race* blank.

The amount of missing data may perhaps reflect the prioritization of populating DSAID. SMEs recounted how both monthly and annual quality control efforts place greater emphasis on correcting and completing DSAID records. While ICRS is part of these efforts, SMEs felt that ICRS was treated as a lower priority than DSAID.

Missing data may also reflect ambiguity around whether and when information should be recorded in ICRS. For example, IDA observed inconsistencies with respect to whether and to what degree informal and anonymous complaints are input into ICRS. Inconsistent data entry practices lead to both an incomplete picture of the types of informal and anonymous complaints that occur at all, as well as uneven levels of information about the ones that have some presence in ICRS.

Lastly, missing data may reflect technological and procedural ambiguity around how to populate ICRS. Apart from the three variables needed to create a record, all other fields in the data entry screen are optional. Moreover, SARCs are presented with all possible fields at all times, even though the relevance of most fields is contingent upon which stage of the accountability process one is documenting. Collectively, such conditions would

understandably make it difficult for SARCs to know which fields they should be populating each time they return to ICRS to update a given record.

B. Increase clarity around how variables should be used.

IDA discovered inconsistencies in how SARCs use variables or data entry fields that are available to them. For example, SARCs may vary in how they input procedural dates, leading to situations in which ICRS' milestones occur out of order.

Some inconsistencies may reflect the amount of guidance that SARCs receive on how to select information for each variable. While SMEs referenced a training manual on the data entry process, they also suggested SARCs may have lingering questions about how to populate variables. For example, SMEs noticed variation in how complainants' and alleged offenders' attributes were being assigned. While complainant-level attributes should, in principle, be those of the complainant, SMEs could not rule out the possibility that some SARCs may have instead assigned attributes based upon the victim. SMEs also believed that there was variation in whether SARCs knew they should update location information should the SARC, complainant, or alleged offender(s) relocate. IDA did not receive a copy of the training manual, so cannot comment on how much guidance SARCs receive on how to navigate these situations.

Inconsistencies may also, as it were, stem from the little guidance that SARCs do receive on how to use ICRS. For example, SMEs explained that SARCs are expected to assign demographic attributes differently for complainants and alleged offender(s). SARCs assign the *Complainant's Grade/Rank* based on the complainant's rank and grade when he or she filed the complaint. Differently, they assign the *Alleged Offender # Grade/Rank* based on the rank and grade that the alleged offender held at the time of the incident. Since each attributional task uses a different underlying logic—complainants at the time of filing and alleged offenders at the time of the incident—it would not be difficult for someone to err during data entry.

Inconsistencies in data entry practices create several challenges for the analyst. If SARCs use different approaches to populate the same variable (e.g., *Reported Date*), the analyst cannot reliably conceptualize what that variable means from a practical standpoint. Likewise, if seemingly similar variables (e.g., demographics) are populated using different underlying logics, the analyst will struggle to gain a complete operating picture of a given incident; for example, one would be unable to test whether the likelihood of reporting was aided or blocked by power differences between the alleged offender(s) and the complainant.

C. Revisit ICRS technologies.

ICRS appears to have several technological features that may make it more challenging to develop accurate and complete records about sexual harassment complaints.

First, as mentioned above, ICRS has almost no data checks before saving; for example, to ensure the appropriate fields have been populated.

Second, IDA learned that ICRS is only able to receive information about one complainant per record. This means that even if there was an incident involving multiple victims, only one complainant would be listed in the record. Since each victim could separately file complaints, it is possible for ICRS to contain multiple records for a given incident. However, there is no way to technologically link these records so future SARCs or analysts would know they stem from the same event.

Third, ICRS is not optimized for change over time. The underlying logic behind how ICRS stores information is to preserve one snapshot of a given complaint. In this sense, updating a variable overwrites what was previously input, instead of storing both pieces of information. If ICRS was only used to capture information about one time point (e.g., the day of the alleged incident), a single snapshot logic would make sense. However, ICRS is used to capture information about multiple time points within a broader process. As such, it would be worth considering a multi-snapshot logic for future technological development. One technological approach would be to add additional variations to account for potential changes. For example, ICRS could allow for multiple location variables per individual since Soldiers and SARCs regularly and routinely relocate. Another approach would be to have ICRS provide a single snapshot on the front end, but store version control information on the back end. This would involve modifying the front end to incorporate a free-text field for SARCs to explain why they changed variables that already contained information. The system could then store a copy of the previous data snapshot; SARCs' comments; and information about which variable(s) were changed, by whom, and when on the backend.

D. Acknowledge fundamental limitations of the complaint documentation process.

The first three recommendations provide actionable ideas on how to enhance the integrity and analytic value of ICRS data. In this last point, IDA would like to acknowledge that certain aspects of the complaint documentation process are harder to change, even if desired.

First and foremost, it is critical to remember that SARCs are only able to populate information that they receive. If a victim chooses to not report an incident or if a complainant does not know all the details of what happened, it would be unfair to hold the SARC responsible for incomplete information. Similarly, since there is little guidance around whether and how often Commanders should update SARCs on any actions

undertaken to look into and address sexual harassment, SARCs do not always have access to the information they need to complete certain case records.

IDA would also like to acknowledge how ICRS may contain seemingly inaccurate or contradictory information that, in fact, accurately reflects real-world possibilities. As discussed earlier, it is not unusual to find cases that were found to be “unsubstantiated” yet resulted in some type of disciplinary action for the alleged offender. While this may seem logically incorrect, it accurately reflects the Commander’s discretionary authority to enact discipline in service of social order.

Lastly, IDA would like to acknowledge the fact that ICRS was not designed as a research database. The way in which ICRS does not separate information about the “complainant” from the “victim” may make it difficult to examine a core analytic question: what types of people are being victimized and how does this compare to who chooses to report? However, this setup correctly honors an important reason why the victim’s information would not be input into ICRS: victims retain the right to not be identified, if they wish, and to instead have someone report anonymously on their behalf.

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Notation Key

- *Italics* = the name of a variable. For example, *Reported Date* is the name of the variable used to log when a sexual harassment complaint was filed.
- “Quotation marks” = the name of a possible value that a variable could contain. For example, *Gender* = “Female.”

Abbreviations

ARD	Army Resilience Directorate
DoD	Department of Defense
DSAID	Defense Sexual Assault Incident Database
ICRS	Integrated Case Reporting System
IDA	Institute for Defense Analyses
MFR	Memorandum for Record
PCS	Permanent Change of Station
SARC	Sexual Assault Response Coordinator
SHARP	U.S. Army Sexual Harassment/Assault Response and Prevention Program
SME	Subject Matter Expert
UCMJ	Uniform Code of Military Justice
UIC	Unit Identification Code

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14. ABSTRACT The Integrated Case Reporting System (ICRS) is a database used by the U.S. Army to store information on sexual harassment complaints. The Army Resilience Directorate tasked IDA with assessing the feasibility of using ICRS for research on the U.S. Army's accountability system for addressing sexual harassment complaints. In response, IDA examined a de-identified copy of ICRS (2011–2020) to understand its scope, breadth, and robustness. To put findings into context, IDA also reviewed government policies to understand how the accountability system ought to work. IDA then engaged subject matter experts from the Army Sexual Harassment/Assault Response Prevention Program to learn how the process ultimately operates in practice. IDA concluded that ICRS provides a good starting point for analysts seeking to understand the U.S. Army's sexual harassment complaint process, as it contains information on a variety of cases. However, IDA also uncovered several features and practices that may create analytic challenges, depending upon the researcher's objectives. This document delivers a summary of IDA's findings along with a set of recommendations on how, if desired, ICRS could be adapted to improve analytic utility for the future.					
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