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**COUNTER**  
**EXTREMISM**  
**PROJECT**

**THE GREEN LIGHT PROJECT, INC.**  
(d/b/a Counter Extremism Project)

**Nondiscrimination Program Plan**

Effective Date: September 1, 2020

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## Introduction

The Counter Extremism Project (CEP) is a recipient of federal assistance from the Department of Homeland Security (DHS). As such, CEP is required to comply with federal nondiscrimination laws.

As part of complying with federal nondiscrimination laws, CEP has established a Nondiscrimination Program.

This document describes CEP's Nondiscrimination Program.

## Background

### CEP

CEP is a not-for-profit, non-partisan, international policy organization formed to combat the growing threat from extremist ideologies. Led by a renowned group of former world leaders and diplomats it combats extremism by pressuring financial and material support networks; countering the narrative of extremists and their online recruitment; and advocating for smart laws, policies, and regulations.

### Federal Nondiscrimination Laws

Title VI of the Civil Rights Act of 1964 is the overarching civil rights law that prohibits discrimination based on race, color, or national origin, in any program, service or activity that receives federal assistance. Specifically, Title VI assures that "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefit of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance."

Nondiscrimination prohibitions have been further broadened and supplemented by related statutes, regulations and executive orders:

- Title IX of the Education Amendments of 1972 (Title IX), which prohibits discrimination on the basis of sex in any education or training program receiving federal financial assistance, with a limited number of defined exceptions;
- Section 504 of the Rehabilitation Act of 1973 (Section 504), which forbids discrimination on the basis of an individual's disability by all federal agencies and in all federally funded activities;
- The Age Discrimination Act of 1975, as amended, which prohibits discrimination in federally supported activities on the basis of age; and
- U.S. Department of Homeland Security regulation 6 C.F.R. Part 19, which prohibits discrimination based on religion in social service programs.

# Nondiscrimination Program

## Overview

The goal of the CEP Nondiscrimination Program is to ensure all people have a meaningful role in processes associated with the delivery of CEP services. This Nondiscrimination Program includes methods of administration and analysis that supports equity in all air quality programs.

Based in part on federal guidance, the components of the CEP Nondiscrimination Program include:

- A notice of nondiscrimination under the federal nondiscrimination laws;
- Grievance procedures for complaints filed under the federal nondiscrimination laws;
- Identification of a CEP Nondiscrimination Program Coordinator and his/her role;
- CEP's substantive policy statement SPS-2018-007-Nondiscrimination Program Policy; Grievance Procedures; and
- An assessment of CEP's obligation to provide access to Limited English Proficiency (LEP) and disabled persons/

## Notice of Nondiscrimination

CEP's Notice of Nondiscrimination (Exhibit A) is prominently and permanently posted in CEP's main office and on the CEP website. The notice describes the procedures to file a complaint and how to contact the CEP Nondiscrimination Program Coordinator for assistance.

## Grievance Procedures

CEP's Grievance Procedures (Exhibit B) explain the process by which any person may file a complaint. Further, the process by which complaints will be investigated and how complainants will be informed (in writing) of the progress and disposition of their complaint is also described. Finally, CEP's Nondiscrimination Program Coordinator contact information is provided.

## Nondiscrimination Program Coordinator

CEP's Nondiscrimination Program Coordinator ensures CEP's compliance with federal nondiscrimination laws and:

- Ensures information regarding CEP's Nondiscrimination Program is internally and externally available;
- Maintains public notice of, and procedures for receipt and processing of complaints;
- Tracks and reviews complaints received;
- Trains CEP staff on CEP's Nondiscrimination Program and procedures;
- Provides written updates to complainants on the progress of investigations; and
- Periodically reviews the efficacy of CEP's Nondiscrimination Program.

## Providing Access to Limited English Proficiency (LEP) and Disabled Persons

Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English can be Limited English Proficient (LEP) and may be entitled to language assistance with respect to services provided by recipients of federal assistance.

As directed by Executive Order 13166, DHS has published guidance to financial assistance recipients regarding Title VI prohibition against national origin discrimination affecting LEP persons. Recipients are required to take reasonable steps to reduce language barriers that can preclude meaningful access to department programs and activities by LEP persons.

Recipients of federal assistance must also provide for meaningful access to programs and activities by disabled persons. Disabled persons have a physical impairment (hearing, mobility, vision) or mental impairment that substantially limits one or more major life activities including walking, talking, hearing, seeing, breathing, learning, performing manual tasks and caring for oneself.

While it is true that determining precisely what steps are reasonable to ensure access for LEP and disabled persons is fact-dependent, development of a public participation plan begins with a clear understanding of the frequency and distribution of LEP and disabled populations in CEP programs funded by DHS grants.

### Limited English Proficiency Persons

Federal guidance generally describes how recipients of federal assistance determine the extent of their obligation to provide LEP services. Four factors should be considered:

- The number or proportion of LEP persons eligible to be served or likely to be encountered by the program;
- The frequency with which LEP individuals come in contact with the program;
- The nature and importance of the program, activity or service provided by the program to people's lives; and
- The resources available to the recipient and costs.

At the beginning of each CEP project utilizing federal grant funds, potential recipients of CEP services should be screened for LEP service needs as well as disabilities that require auxiliary aids and services. CEP's Language and Disability Access Plan (Exhibit C) should be utilized to implement the necessary screening and services.

CEP has the resources to provide LEP services as identified in the Public Participation Procedures below.

### Public Participation Procedures

CEP will take reasonable measures to provide access to its programs to LEP persons and/or to those with disabilities. Requests for language interpretation services or for disability accommodations should be made at least 48 hours in advance of the relevant program or event, and CEP will provide appropriate notices to participants with contact information to request services/accommodations. Notices to project

## CEP Nondiscrimination Program Plan

participants with disabilities or who are LEP persons will be provided with appropriate auxiliary aids and services whether or not requested.

CEP provides appropriate auxiliary aids and services (including qualified interpreters) to LEP persons, disabled persons who are deaf or hard of hearing, and other individuals as necessary at no cost to ensure effective communication and an equal opportunity to participate fully in programs.

## **EXHIBIT A – Notice of Nondiscrimination**



## NOTICE OF NONDISCRIMINATION

Counter Extremism Project complies with Federal civil rights laws and is committed to providing its programs and services without discrimination in accordance with:

- *Title VI of the Civil Rights Act of 1964*, which prohibits discrimination based on **race, color, or national origin** (including **language**).
- *Section 504 of the Rehabilitation Act of 1973*, which prohibits discrimination based on **disability**.
- *Title IX of the Educations Amendments Act of 1972*, which prohibits discrimination based on **sex** in education programs or activities.
- *Age Discrimination Act of 1975*, which prohibits discrimination based on **age**.
- *U.S. Department of Homeland Security regulation 6 C.F.R. Part 19*, which prohibits discrimination based on **religion** in social service programs.

### To File a Complaint

If you think that Counter Extremism Project has failed to provide these services or discriminated in another way based on race, color, national origin (including language), disability, sex, or age, you can file a complaint in person or by mail, fax or email with: David Ibsen, ph: 212-922-0061, fax: 212-922-0067, [dibsens@counterextremism.com](mailto:dibsens@counterextremism.com).

You can also file a [civil rights complaint with the U.S. Department of Homeland Security Office for Civil Rights and Civil Liberties \(CRCL\)](#):

**E-mail:** [CRCLCompliance@hq.dhs.gov](mailto:CRCLCompliance@hq.dhs.gov) (fastest method to submit your complaint)

**Fax:** 202-401-4708

**U.S. Mail:**

U.S. Department of Homeland Security  
Office for Civil Rights and Civil Liberties  
Compliance Branch  
245 Murray Lane, SW  
Building 410, Mail Stop #0190  
Washington, D.C. 20528

For additional information: [www.dhs.gov/crcl](http://www.dhs.gov/crcl)  
Phone: 202-401-1474 Toll-Free: 1-866-644-8360

### Information and Services for Persons with Disabilities and Persons with Limited English Proficiency

Counter Extremism Project

- Provides free aids and services, such as qualified sign language interpreters and written information in other formats (large print, audio, accessible electronic formats, etc.), to communicate effectively with persons with disabilities.
- Provides free language services, such as qualified foreign language interpreters and information written in other languages, to ensure meaningful access to programs and activities for persons with limited English proficiency.

**If you need these services, please contact:**

David Ibsen, ph: 212-922-0061, fax: 212-922-0067, [dibsens@counterextremism.com](mailto:dibsens@counterextremism.com).



## **EXHIBIT B – Grievance Procedures**

### **CEP Nondiscrimination Program**

Title VI of the Civil Rights Act of 1964 establishes the requirements for the CEP's Nondiscrimination Program. Title VI prohibits discrimination on the basis of race, color, or national origin in programs or activities receiving federal financial assistance. Federal statutes and presidential executive orders under the umbrella of Title VI also address minority and low-income populations and services to those individuals with Limited English Proficiency (LEP), women and the disabled.

### **What Does This Mean?**

CEP cannot, on the basis of race, color, or national origin either directly or through contractual means, take any of these actions:

- Deny program services, aids or benefits
- Provide a different service, aid or benefit, or provide them in a manner different from what is provided to others
- Segregate or separately treat individuals in any matter related to the receipt of any service, aid or benefit

Any federal financial aid sub-recipient is required to administer its program and activities without regard to race, color, or national origin.

### **Filing a Complaint**

Complaints may be filed by any person who believes she or he has been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any CEP service, program or activity, and believes the discrimination is based upon race, color, or national origin. Complaints may be filed with the CEP's Nondiscrimination Program Coordinator.

A signed, written complaint must be submitted within 180 days of the alleged discriminatory act (or latest occurrence). A Complaint form is attached to these Procedures. LEP persons and persons with disabilities will be provided with appropriate auxiliary aids and services upon request to aid them throughout the complaint process.

### **Complaint Procedures**

CEP does not promote or tolerate discrimination. The CEP's Nondiscrimination Program has been established to ensure all people have a voice in air quality protection and to provide a process through which allegations of discrimination are investigated and resolved.

### **Complaint Review**

If someone believes they have suffered from discrimination under any CEP program, they may contact the CEP's Nondiscrimination Program Coordinator to seek informal resolution. If the matter cannot be resolved informally, the following steps will be followed:

- Within 180 days of the alleged discrimination, complainants may submit a written or verbal complaint to the Nondiscrimination Program Coordinator. Complaints must include the complainant's name, the nature of the complaint, the date of the alleged discrimination, requested action and contact information. Complaint forms are available in Complaint Form - English | Spanish
- The Nondiscrimination Program Coordinator will review the complaint and may solicit additional information from the complainant as needed. If additional information is requested and not received, the case may be closed. The case may also be closed if the complainant no longer wishes to pursue their case.
- A complaint log will be kept by CEP containing the name and address of the complainant, nature of the complaint, date of submission and results of the investigation.
- If the complaint is outside the jurisdiction of CEP, the complainant will be notified of the name and contact information for the appropriate agency with jurisdiction, if known.

### Complaint Processing

If the complaint is within the jurisdiction of CEP, or informal resolution was not possible, it will be promptly and impartially investigated. CEP's goal is to address complaints within 60 days of receipt, though the time to carefully investigate complaints may be longer depending on the nature of the complaint and complexity of the issue.

### Preliminary Inquiry

CEP will conduct a preliminary inquiry to determine the need for further investigation.

- CEP will notify the complainant in writing that a preliminary inquiry is underway to determine the need for further investigation.
- If the preliminary inquiry by CEP indicates that an investigation is warranted, the complainant will be notified in writing and an interview will be scheduled.
- If the preliminary inquiry indicates an investigation is not warranted, the complainant will be notified in writing of the reasons why and factors considered.

### Complaint Investigation

- Complaints warranting further investigation will be promptly and impartially processed by the Nondiscrimination Program Coordinator. The preponderance of evidence standard will be applied to all complaint investigations. The results of the investigation will be provided to the CEP Director and Deputy Director for review.
- The complainant will be notified in writing of the results of the investigation and what actions will be/have been taken in response and a timeline to request review.
- Records and investigative files will be kept for a minimum of three years.

## Intimidation and Retaliation Prohibited

CEP will not tolerate intimidation, threats, coercion, or discrimination against any individual or group, either:

- For the purpose of interfering with any right or privilege guaranteed under law or regulations, or
- Because the individual has filed a complaint or has testified, assisted or participated in any way in an investigation, proceeding or hearing or has opposed any CEP action or decision.

### **For questions, please contact us:**

David Ibsen  
CEP Nondiscrimination Program Coordinator  
Counter Extremism Project  
PO Box 3980  
New York, NY 10185  
E-mail: <mailto:dibsen@counterextremism.com>  
Phone: 212-922-0061

## EXHIBIT C – Language and Disability Access Plan

At the beginning of each CEP project utilizing federal grant funds (a Program), potential recipients of CEP services should be screened for LEP service needs as well as disabilities that require auxiliary aids and services. The following plan outlines steps to be taken both to identify potential recipients of LEP services or auxiliary aids and services as well as implementation of such services and ongoing assessment. Determinations regarding such services should be made in consultation with CEP’s Nondiscrimination Program Coordinator.

### Identification

#### Limited English Proficiency (LEP)

- Prior to delivery of service in any CEP Program, CEP staff will assess potential recipients of the services to determine the number that might require LEP services. If operating within a federal, state or local institution that has conducted an equivalent assessment (such as a prison), CEP may rely on the determinations made by appropriate staff, but only if such determinations are documented.
- For each potential recipient of LEP services, a determination of need as well as the person’s language(s) of communication can be made using the “I Speak” resources found at LEP.gov (<http://www.lep.gov>) or a similarly effective system. Determinations should include the following:
  - the relevant population/service area
  - percentage of LEP persons in the population/service area
  - languages spoken within the population/service area
  - languages encountered by Program personnel (on an ongoing basis) and where/when in the Program

#### Disability Access

- Prior to delivery of service in any CEP Program, CEP staff will assess potential recipients of services to determine the number that might require auxiliary services as a result of a disability that affects their ability to communicate, including diminished eyesight, diminished hearing, etc. If operating within a federal, state or local institution that has conducted an equivalent assessment (such as a prison), CEP may rely on the determinations made by appropriate staff, but only if such determinations are documented.

#### Assistance Measures and Available Resources

- CEP program managers will determine what resources are available in the area of a Program for LEP persons and persons with disabilities and distribute information to Program personnel on how to access the relevant resources.
- All interactions with LEP persons or persons with disabilities should utilize LEP resources and auxiliary services (as needed) to ensure effective communication with participants and potential participants in the Program in question. In designing specific program guidelines, attention should be given to:
  - Types of interactions anticipated, such as calls, electronic communications, classroom instruction, etc.

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- Types of language services available for each such category of interaction, such as automatic translation, interpreters, written materials in multiple languages, language identification tools, bi-lingual staff, braille and reading services, etc.
- Written guides for Program personnel on how to access each service when needed.
- Program-specific parameters for implementation of services, including (i) provision of services in controlled environments such as prisons, refugee camps, etc.; (ii) determination of which Program materials are essential or ancillary to prioritize services and resources; and (iii) local and cultural barriers to provision of services such as gender norms and restricted freedom of movement.
- Access to Grievance Procedures as outlined in the CEP Nondiscrimination Program Plan by LEP persons and persons with disabilities.
- To ensure competency of LEP service and auxiliary service providers, each must be approved in advance by the Program manager in consultation, as necessary, with CEP's Nondiscrimination Program Coordinator.
- All potential participants in CEP Programs will receive notice of LEP services and assistance for persons with disabilities in connection with CEP's Nondiscrimination Notices.
  - Notice should be given at the beginning of Program services and in connection with solicitation of program participants in the same way as such solicitation takes place, taking into consideration Program-specific parameters outlined above.
  - When deemed necessary or beneficial by the Nondiscrimination Program Coordinator or the particular Program's manager, more targeted notices can be provided to augment the standard notice procedure.

### Training

- CEP Program personnel must know their obligations to provide meaningful access to information and services for LEP persons and persons with disabilities as well as the resources available prior to Program implementation and/or engagement with recipients of Program services.
  - Program managers will conduct training of all Program personnel on identification of LEP persons and persons with disabilities, provision of relevant services and overall familiarity with the Language and Disability Access Plan.
  - Such training can be incorporated into orientation for CEP employees if applicable.

### Monitoring, Assessment and Plan Updates

- At least biannually, the Nondiscrimination Program Coordinator should conduct a review of the effectiveness of this Plan and provide any recommendations for improvement to CEP management. The review should include the following:
  - New or updated LEP service and disability access service guidance from federal agencies provided since the Plan was last updated.
  - LEP persons and persons with disabilities actually encountered in past CEP Programs, including needs, services provided and outcomes relative to Program participants that were not LEP persons or persons with disabilities (to the extent this comparative data is available given IRB restrictions). This should include input from Program personnel that implemented the relevant Program.

- Changes in the population of LEP persons and persons with disabilities in areas where then current Programs are ongoing.
- Need for notices of any Plan or resource changes to LEP persons and persons with disabilities in areas where then current Programs are ongoing.
- Priority in conducting any assessment of this Plan should be given to federal assessment resources, such as the [Sample Self-assessment from U.S. DOJ Language Access Assessment and Planning Tool](#)

### Language Access Plan Resources

- Website of Federal Interagency Working Group on Limited English Proficiency: [www.lep.gov](http://www.lep.gov) contains resources, tools, technical assistance, and updated information on language access activities for agencies of the Federal government, recipients, and other entities that support language access.
- Department of Justice Video – How to Better Serve Your LEP Audience by Meeting the Federal Requirements - <https://www.youtube.com/watch?v=F3LM8LmysgU>
- [Department of Justice Tips & Tools for Reaching LEP Communities in Emergency and Disaster Preparedness, Response, and Recovery](#)
- Multilingual Materials - <https://www.lep.gov/community-organizations#MM>