

## ISD-US POLICY AND NOTICE OF NONDISCRIMINATION

The Institute for Strategic Dialogue-US 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 Education 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.

It is against the law for the Institute for Strategic Dialogue US to retaliate against anyone who takes action to oppose discrimination, files a grievance, or participates in the investigation of a grievance in accordance with the above authorities.

### Complaint Process

If an individual thinks that the Institute for Strategic Dialogue US has failed to provide these services or has discriminated in another way based on race, color, national origin (including language), disability, sex, age, or religion, they can direct complaints by mail, email, or telephone to the channels identified below:

**Name:** Dixon Osburn, Executive Director

**Email:** [info@isdglobal.org](mailto:info@isdglobal.org)

**Mail:** 1032 15th St. NW, Suite 285, Washington, DC 20005

**Tel:** 202-464-2517

Individuals 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)

**Fax:** 202-401-4708

**Mail:** U.S. Department of Homeland Security Office for Civil Rights and Civil Liberties Compliance Branch, Mail Stop #0190 2707 Martin Luther King, Jr. Ave., SE Washington D.C. 20528

Upon receiving a complaint of discrimination, ISD-US will:

- Acknowledge receipt of the complaint within 10 business days.
- Investigate the complaint in a fair and impartial manner. This investigation will be completed within 30 calendar days, following the submission of the initial complaint. During the internal investigation, ISD-US may gather relevant facts, interview witnesses, and review any documentation relevant to the complaint.
- Once the investigation is complete, ISD-US will issue a written response to the complainant detailing its findings, as well as any corrective actions that may have been taken. If the complaint is upheld, ISD-US will take appropriate action to address the discrimination. If the complaint is not upheld, the complainant will be notified and informed of their right to appeal.

ISD-US is committed to ensuring that individuals with disabilities or limited English proficiency (LEP) are also able to access the complaint process. To facilitate access to the complaint process:

- ISD-US will provide complaint forms, correspondence and other documents in accessible formats as well as translated versions upon request. Individuals may request sign language interpreters or other aids during the complaint process, as required.
- ISD-US will provide assistance in the language of the complainant, as and where appropriate. ISD-US will provide translation services for any written complaints, and any subsequent correspondence, submitted through e-mail or mail. ISD-US will also provide access to oral interpretation services for complaints submitted over the phone, or any subsequent verbal engagement with the individual.

ISD-US is dedicated to ensuring that the complaint process is widely available to members of the public. A summary of this non-discrimination policy and the complaint process will be posted on the ISD-US website.

For any additional information on the complaints process please visit, please visit: [www.dhs.gov/crcl](http://www.dhs.gov/crcl).

## ENSURING SUBRECIPIENT ADHERENCE TO FEDERAL CIVIL RIGHTS LAWS ON NON-DISCRIMINATION

**The Institute for Strategic Dialogue-US** seeks to ensure that any sub-recipients are in compliance with all applicable Federal civil rights laws and is committed to providing its programs and services without discrimination. This policy applies to all sub-recipients receiving funding from the Institute for Strategic Dialogue-US and which are engaged in any program or activity supported by such funds. As such:

- All contracts with ISD-US sub-recipients include a non-discrimination assurance clause that affirms the sub-recipient's commitment to comply with Federal civil rights laws and their commitment to providing its programs and services without discrimination in accordance the following laws: *Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Title IX of the Education Amendments Act of 1972, Age Discrimination Act of 1975, U.S. Department of Homeland Security regulation 6 C.F.R. Part 19.*
- The Institute for Strategic Dialogue-US maintains a record of all contracts with project sub-recipients.
- Sub-recipients agree to maintain a detailed log of any complaints alleging discrimination against any protected characteristics including but not limited to race, color, national origin, disability, sex, age or religion and any actions taken in response to the complaint. These complaints will be reported to the Institute for Strategic Dialogue-US in a timely manner.
- The Institute for Strategic Dialogue-US will ensure the sub-recipient's adherence to their civil rights obligations by conducting a compliance review on an annual basis. This will consist of a yearly review of the organization's policies, procedures and complaint records as well as interviews with staff, if the contract is active.
- If a sub-recipient is found to be non-compliant with civil rights requirements, the Institute for Strategic Dialogue-US will issue findings and require corrector action plans to be developed and implemented. Any continued compliance breaches may result in the termination of the sub-award agreement.

This policy will be reviewed periodically and updated as necessary to reflect changes in civil rights laws and regulations. Sub-recipients are responsible for ensuring they remain informed of any updates to civil rights laws and adjust their policies accordingly.

### Review Policy:

This policy will be reviewed on an annual basis and revised as needed to reflect changes in regulations or best practices related to disability rights and reasonable accommodations.

### Effective Date:

This policy is effective as of 1/31/2025 and applies to all programs and activities offered by the Institute for Strategic Dialogue-US.

## ANTI-DISCRIMINATION STATEMENT

This policy establishes **the Institute for Strategic Dialogue-US** commitment to ensuring that its programs, services and activities are accessible and inclusive for all individuals, including those with disabilities in accordance with *Title VI of the Civil Rights Act of 1964* and *the Americans with Disabilities Act (ADA)*. This policy sets forth procedures for accepting and responding to requests for reasonable accommodation from staff and participants. This policy applies to all external-facing programs, services, and activities offered by the Institute for Strategic Dialogue-US.

**The Institute for Strategic Dialogue-US** does not discriminate against any individuals on the basis of protected disability in any of its programs, services or activities.

### PROCEDURES FOR ACCEPTING AND RESPONDING TO REQUESTS FOR REASONABLE ACCOMMODATIONS:

- Notification to external beneficiaries: **the Institute for Strategic Dialogue-US** will ensure that all external beneficiaries or participants are informed of their right to request reasonable accommodation through the inclusion of statements regarding availability on the ISD-US website, email communication and event materials.
- Beneficiaries/Participants may request accommodation by contacting the designated ISD-US Project Manager via phone or email. The request must include a description of the accommodation needed and any relevant information regarding the individual's disability that informs the request and can be reasonably accommodated based on ADA guidelines
- The Institute for Strategic Dialogue-US will acknowledge receipt of the request within 5 business days and a decision on the request will be communicated in writing, detailing whether the accommodation will be provided or explaining the reason for denial.
- The Institute for Strategic Dialogue-US will provide necessary and reasonable accommodations, which may include modifications to physical spaces to ensure accessibility, aids and services (such as sign language interpreters or assistive listening devices) and reasonable adjustment to programs based on ADA guidelines.
- If a request for accommodation is denied or if a beneficiary has concerns regarding the accommodation provided, an appeal may be filed with:  
Anna Stolbova, Director of US Operations  
Dixon Osburn, Executive Director.
- The Institute for Strategic Dialogue-US will provide regular training to its staff members to ensure an understanding of the non-discrimination policies and procedures for handling accommodation requests, including bi-annual Anti-Harassment/Anti-Sexual Harassment training
- The Institute for Strategic Dialogue-US will maintain accurate records of all accommodation requests and any responses, as well as any appeals and their outcomes to monitor the effectiveness of this policy and make improvements as necessary.

### Review Policy:

This policy will be reviewed on an annual basis and revised as needed to reflect changes in regulations or best practices related to disability rights and reasonable accommodations.

### Effective Date:

This policy is effective as of 1/31/2025 and applies to all programs and activities offered by the Institute for Strategic Dialogue-US.

## INFORMATION AND SERVICES FOR PERSONS WITH DISABILITIES AND PERSONS WITH LIMITED ENGLISH PROFICIENCY

**The Institute for Strategic Dialogue-US** prohibits discrimination based on race, color, or national origin (including language) in accordance with *Title VI of the Civil Rights Act of 1964* and the *Americans with Disabilities Act*. This policy sets forth the guidelines for providing language accessible services to individuals that are limited English Proficient (LEP).

### Definitions:

- *Limited English Proficient individuals means any individual whose primary language is not English, and has limited or no ability to speak, understand, read, or write English.*
- *Primary language means the language that an individual communicates most effectively in.*
- *Translation is converting written text from one language into written text in another language.*
- *Interpretation is the process of orally rendering a spoken or signed communication from one language into another language.*
- *A qualified interpreter or translator is a trained professional who is a neutral third party with the requisite language skills, experienced in interpretation or translation techniques, and knowledgeable in specialized content areas and technical terminology in order to effectively facilitate communication between two or more parties who do not share a common language.*

### Language Access Plan (LAP):

The below Language Access Plan (LAP) outlines the reasonable steps that **the Institute for Strategic Dialogue-US** will take in order to provide meaningful access to its programs and services for limited English proficient persons:

**The Institute for Strategic Dialogue-US** will provide, at no cost, appropriate auxiliary aids and language assistance to ensure LEP individuals and disabled persons who are deaf or hard of hearing, to ensure they have meaningful access to its body of work. These measures include offering qualified interpreters for in-person or over-the-phone conversations, translation of materials and documentation upon request and utilizing bi-lingual staff-members where possible to support LEP individuals. The Institute for Strategic Dialogue-US's work is made accessible across the US. As approximately 13% of the US population is proficient in Spanish, ISD-US will direct resources to ensure the availability of key materials and services in Spanish, upon request.

**The Institute for Strategic Dialogue-US** will conduct an annual review of language needs of the LEP individuals likely to be served by maintaining accurate records of the frequency of LEP requests for services. Staff at the initial point of contact will conduct an assessment for the need for language assistance and notify the individual of the right to an interpreter at no cost.

**The Institute for Strategic Dialogue-US** will inform LEP individuals about the availability of free language assistance services through public notices on the [isdglobal.org](http://isdglobal.org) website, on-site signage at offices and meeting venues.

LEP Individuals can request language services by contacting ISD at: [info@isdglobal.org](mailto:info@isdglobal.org)

LEP individuals who experience difficulty accessing services or believe their rights were not upheld may submit a complaint either by mail, email or telephone to the Executive Director, Dixon Osburn.

**Email:** [info@isdglobal.org](mailto:info@isdglobal.org)

**Mail:** 1032 15th St. NW, Suite 285, Washington, DC 20005

**Tel:** 202-464-2517

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**Fax:** 202-401-4708

**Mail:** U.S. Department of Homeland Security Office for Civil Rights and Civil Liberties Compliance Branch,  
Mail Stop #0190 2707 Martin Luther King, Jr. Ave., SE Washington D.C. 20528

**Review Policy:**

This policy will be reviewed on an annual basis and revised as needed to reflect changes in regulations or best practices related to disability rights and reasonable accommodations according to the ADA.

**Effective Date:**

This policy is effective as of 1/31/2025.