



ACCOMPANY CAPITAL LANGUAGE ACCESS POLICY

POLICY STATEMENT

It is the policy of Accompany Capital (“AC”) not to discriminate against any person with Limited English Proficiency (“LEP”). As a mission-driven Community Development Financial Institution (CDFI), Accompany Capital is committed to providing timely, free, and meaningful access to financial products, services, and information for LEP individuals. This is done in alignment with the provisions set forth in our Language Assistance Plan (“LAP”) and in compliance with Title VI of the Civil Rights Act of 1964.

PURPOSE AND AUTHORITY

Accompany Capital is a nonprofit CDFI that provides affordable loans and support to underserved entrepreneurs in the New York Metro Area. Through accessible loans, bilingual business advising, and culturally competent training, we ensure that all entrepreneurs—regardless of their English proficiency—can successfully start and grow their businesses.

This Language Access Policy (the “Policy”) outlines effective guidelines and procedures for staff to ensure equal access for LEP individuals to our programs, in accordance with Title VI and the Americans with Disabilities Act (ADA). Language assistance is a critical component of Accompany Capital’s mission to promote financial inclusion, economic opportunity, and equity for all communities we serve.

LANGUAGE SERVICES PROVIDED

Translation and interpretation services are provided free of charge to clients and are delivered through a combination of bilingual staff and translated materials. Key program documents are available in nine languages, including: English, French, Spanish, Saudi Arabic, Iraqi Arabic, Dari, and Pashto. These materials are prominently displayed in the main lobby of Accompany Capital’s offices and distributed during client intake.

Accompany Capital loan staff collectively speak **15 languages and dialects**, allowing us to provide services that reflect the linguistic and cultural diversity of our client base.

CLIENT INTAKE AND ASSIGNMENT

All intake and loan inquiries follow a screening and assessment process. During this intake, staff assess a client's English proficiency and, when applicable, assign a primary Loan Officer who speaks the client's preferred language.

It is standard procedure for one Loan Officer to guide the client throughout the lifecycle of the loan—from initial application to loan servicing and technical assistance. This continuity is particularly effective when language alignment enhances communication and trust.

ON-DEMAND AND EXPANDED LANGUAGE SERVICES

Upon request and within reasonable timeframes, Accompany Capital will provide translations of additional program information in languages not currently offered. Decisions to expand language offerings are made based on demand, community need, and available resources.

In 2024, Accompany Capital implemented an **Accessibility Widget** to ensure website accessibility and ADA compliance for all users.

POLICY REVIEW

This Policy is reviewed at least annually by Accompany Capital's management and submitted to the Board of Directors for approval. Revisions are made based on client demographics, staff feedback, service usage, and evolving best practices.

LANGUAGE ACCESS PLAN

IDENTIFICATION OF LANGUAGE NEEDS

Accompany Capital regularly assesses the language needs of its clients and service areas through:

- Intake and loan application forms
- Demographic data on primary languages spoken
- Feedback from staff and clients
- Tracking the usage of translated materials
- Analysis of LEP client trends across boroughs and business sectors

Priority is given to languages commonly spoken by immigrant entrepreneurs in NYC.

PROVIDING LANGUAGE ASSISTANCE SERVICES

Accompany Capital provides the following services at no cost to LEP clients:

- Bilingual staff assistance where available
- Translation of key documents, brochures, disclosures, and forms
- Interpretation services through qualified third-party vendors, when needed

Requests for assistance should be submitted to [**info@accompanycapital.org**](mailto:info@accompanycapital.org).

Resources are allocated based on frequency of use, relevance to client services, and available funding.

NOTICE OF LANGUAGE SERVICES

Accompany Capital informs clients of the availability of language access services through:

- Notices in client welcome materials and brochures
- In-office signage and outreach event materials
- Verbal communication during intake and counseling

TRAINING AND COMPLIANCE

Based on resources available to AC, its staff will receive training on the content of the language access policy, how to identify the need for language access services, how to work with LEP individuals, and how to provide language-accessible services in a culturally sensitive manner.

Supervisors ensure that frontline and program staff understand and apply this policy in their daily work.

MONITORING AND ASSESSMENT

Accompany Capital collects and monitors data to ensure effectiveness of this policy, including:

- Primary languages of clients
- Number of translated materials requested
- Frequency and nature of interpretation services provided

- Staff referrals and any reported issues or complaints

INTERNAL LANGUAGE ACCESS

For all language access requests or concerns, contact: **info@accompanycapital.org**.

COMPLAINT PROCESS

Clients who believe they were denied language access or received inadequate service may submit a complaint verbally or in writing. Please include:

1. Date of the incident
2. Individuals involved
3. Description of the issue

Complaints should be submitted to: **info@accompanycapital.org**. A written response will be provided within **30 calendar days**.