

Synergies Seed Fund (SSF) Language Access Plan

This Language Access Plan has been prepared and implemented in connection with SSF's application for federal financial assistance from the U.S. Department of the Treasury, Community Development Financial Institutions Fund (CDFI Fund).

This document can also be found at this [weblink](#) (website for Synergies Seed Fund). It was prepared having regard to the directives and guidelines in the Treasury Department's *Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons* (Federal Register / Vol. 70, No. 23 / Friday, February 4, 2005 / Notices), and the DOJ's *Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs* (Federal Coordination and Compliance Section Civil Rights Division U.S. Department of Justice, May 2011). A document entitled *Guide to Developing a Language Assessment Plan*, published by The Centers for Medicare & Medicaid (Revision Date, August 2023, Paid for by the U.S. Department of Health & Human Services) was also referenced.

SSF

SSF's mandate is to empower entrepreneurs with disabilities to address the unique challenges they face including, in particular, limited access to capital and barriers to financial services.

SSF's vision is to bridge those gaps by delivering specialized financial solutions, personalized advisory services, and comprehensive training programs to equip entrepreneurs with disabilities with the skills and knowledge necessary to successfully navigate the financial landscape to build sustainable and scalable businesses.

A. Development of SSF's Language Access Plan

Following the guidelines in the Treasury and DOJ documents, this document is organized as follows.

- Assessment of the extent of SSF's obligation to provide LEP services, which will consider the following factors:
 - How LEP individuals will interact with SSF.
 - The number or proportion of LEP persons eligible to be served or likely to be encountered by SSF
 - The frequency with which LEP individuals come in contact with SSF.
 - The nature and importance of the program, activity, or service provided by the program to people's lives.
 - The resources available to SFF for Language Access and costs.

- Other assessments:
 - Understanding how LEP individuals interact with SSF.
 - How best to provide language assistance services in the context of the previous assessment.
 - How best to train staff on policies and procedures.
 - How to provide notice of language assistance services.
 - How to monitor, evaluate, and update SSF's language access policy directives, plans, and procedures.

Following an overview of SSF's assessment, this document will be divided into the following sections:

- SSF's Language Access Policy Directive
- SSF's Language Access Implementation Plan
- Language Access Procedures, made up of:
 - The Language Assistance Services SSF will provide and how it will provide them.
 - The staff roles that will be trained on SSF's Language Access Policy and Procedures.
 - SSF's procedures (timing, etc.) to monitor, evaluate, and update its Language Access Policy Directives, Plan, and Procedures.

B. Assessment

1. How LEP individuals will interact with SSF.

SSF's operation is entirely virtual. It does not have offices.

Therefore, entrepreneurs with disabilities wishing to interact with SSF do so initially by email or through a contact form on SSF's website. This applies to all entrepreneurs with disabilities, including those who are LEP persons. SSF considered establishing a physical office to exclusively serve entrepreneurs with disabilities who are LEP persons, but it was determined that that was not feasible.

Following initial contact, follow-up contacts are by email, telephone, and/or videoconference.

2. The number or proportion of LEP persons eligible to be served or likely to be encountered by SSF.

In addition to other sources, we reviewed the data sources recommended in the DOJ document:

- <http://www.census.gov/hhes/socdemo/language/data/index.html>
- www.factfinder.census.gov

- <http://www.census.gov/hhes/socdemo/language/index.html>
- <http://ocrdata.ed.gov/>
- <http://nces.ed.gov/fastfacts/display.asp?id=96>
- http://www.lep.gov/demog_data.html.

SSF is a volunteer organization. SSF's clients are entrepreneurs with disabilities who reside largely in the state of Georgia, extending to those in the South and Appalachian regions. Our clients are adults because our services relate to obtaining financing to operate a business and other financial services.

At the present time, SSF does not contemplate serving entrepreneurs with disabilities in other parts of the U.S. We would direct those individuals to organizations providing similar services in their state or region.

In order to assess the number or proportion of LEP persons eligible to be served or likely to be encountered by SSF, we examined two sets of data:

- The number of individuals with disabilities, including by ethnicity/race because ethnicity/race relates to English language proficiency.
- The number of LEP individuals by ethnicity/race.

The Number of Individuals with Disabilities

We note the following data:

- According to a 2021 study by the Centers for Disease Control and Prevention, approximately one in four adults (25.7%) in the U.S., or 61 million people, report living with at least one disability and adults living in the South are more likely to have a disability.
- In Georgia, 29% of the population, 2,270,089 adults, have a disability.
- From [here](#): “One in nine working-age adults (18-65) has a disability that may put them at risk of exclusion from the economic mainstream. (We will refer to this group as “individuals with exclusionary disabilities.”)

“This rate varies dramatically by race and ethnicity. African Americans, at 14%, are the most likely to have an exclusionary disability, followed by Non-Hispanic Whites (11%), Latinos (8%), and Asians (5%).”

SSF offers its services to all individuals who identify as disabled. We consider it particularly important that services are available to individuals with exclusionary disabilities.

The Number of LEP individuals

Similar to the number of individuals with exclusionary disabilities varying with ethnicity/race, so too does the number of LEP individuals in a population vary with ethnicity/race.

For example, LEP individuals make up only a very small percentage of the Black population, the group with the largest number of individuals with exclusionary disabilities:

“The vast majority (96%) of the Black population as of 2022 either speaks only English (89%), or they speak another language at home and also say they speak English very well (8%). Besides English, other languages spoken at home by the U.S. Black population include Spanish (4%), French or Haitian Creole (3%), and Amharic and other Ethiopian languages (1%).” [From [here](#).]

Non-Hispanic Whites are the group with the next highest number of individuals with exclusionary disabilities. We found no data to suggest that LEP individuals make up a statistically significant percentage of this group.

The next group is Hispanics, in which 8% of the population is made up of individuals with exclusionary disabilities.

According to U.S. Census data, 13.2% of the U.S. population speaks Spanish (41.3 million people). Acknowledging that a portion of this group also speaks English, that still leaves a significant percentage of the population that is likely to be LEP individuals.

5% of Asians have an exclusionary disability. A relevant characteristic of this group is that it is not represented by a single language. According to [2021 census data](#), Asian languages spoken at home in the U.S. include:

Chinese*	3.40 million	Japanese	455,000
Tagalog (Filipino)	1.72 million	Hmong	240,000
Vietnamese	1.52 million	Khmer	193,000
Korean	1.07 million	Other Asian languages	460,000

* Mandarin, Cantonese, Hokkien and all other varieties.

Focusing on the state of Georgia, LEP data is similar to U.S. data:

- According to a [report on linguistic diversity in Georgia](#), approximately 1.4 million residents of Georgia (14.3% of the population) speak a language other than English at home. Among these, approximately 550,000 are considered “limited English proficient,” meaning they speak English “less than very well.”

- From [here](#), the most common non-English languages spoken as the primary language in households in Georgia are Spanish (801,066 households), Vietnamese (54,826 households), and Chinese (Mandarin, Cantonese) (51,344 households).

Conclusions regarding the number or proportion of LEP persons eligible to be served or likely to be encountered by SSF.

From the data just discussed, we reach the following conclusions:

- The Black community contains the largest number, as a percentage, of individuals with exclusionary disabilities but very few LEP individuals. Therefore, we conclude that SSF can effectively provide services to Black individuals with exclusionary disabilities in English.
- We conclude that we can effectively serve the Non-Hispanic White community in English.
- Given the significant size of the Spanish-speaking population and that 8% of Hispanics have an exclusionary disability, we conclude that SSF should offer Spanish language access.
- Given the relatively small number of households in which an Asian language is spoken, the smaller percentage (5%) of individuals in that group who have exclusionary disabilities, and the practical challenges and expense of addressing the range of languages in the group, we conclude that SSF cannot offer LEP services to this group at this time, except on a one-off, ad hoc basis, i.e., we will provide language access services to an individual in this group if he or she makes initial contact with SSF in English or Spanish with the assistance of an advocate or staff member of a referring agency.

3. The frequency with which LEP individuals come into contact with SSF.

To assess this metric, we first examined the LEP encounters of SSF's sister organization, Synergies Work (www.synergieswork.org). Synergies Work and SSF serve the same community.

The staff at Synergies Work who run its various programs and cohorts report no contacts with LEP persons in the past 7 years.

Accordingly, we conclude the frequency with which LEP individuals will come into contract with SSF will be low.

4. *The nature and importance of the program, activity, or service provided by the program to people's lives.*

Although we believe strongly in the value of the work that SSF does, we acknowledge that it is not the same as, for example, the provision of medical care or the necessities of life. No one will suffer physical harm or loss of life if they are not able to access SSF services.

Having said that, however, we argue that the benefits to entrepreneurs with disabilities who achieve economic success with our support are substantial in terms of their sense of self-worth as well as the freedom that financial independence brings. If not complete financial independence, the benefits of generating income of their own are material.

We recognize that the challenges faced by entrepreneurs with disabilities are heightened if an individual is also LEP. Therefore, we have developed a Language Access Plan that goes as far as it can to ensure that entrepreneurs with disabilities who are also LEPs have access to our services.

5. *The resources available to SSF for Language Access and costs.*

Although SSF does not have substantial resources, given the small number of LEPs we expect to be serving, we believe we can achieve an appropriate balance between costs and providing the necessary service.

6. *How to best provide language assistance services in the context of the previous assessment.*

We have concluded that the best course is to retain the services of third-party professionals (interpreters and translators) to provide language access when required. Our team is not large enough for it to be practical to hire staff members fluent in the various languages we may encounter.

7. *How best to train staff on policies and procedures.*

On the basis of our assessment, we believe the best course of action is to (1) train all staff members on the importance of ensuring access to SSF for all LEPs who are entrepreneurs (or entrepreneurs-to-be) with disabilities, (2) train leaders and managers on their specific responsibilities with respect to ensuring access for LEPs, including monitoring and conducting annual reviews of SSF's Language Access Plan and Procedures, and (3) train client-facing team members on the procedures to be followed when working with an LEP.

8. *How to provide notice of language assistance services.*

Because SSF does not have physical premises, notices will be provided online, including on SSF's website.

SSF does not advertise on social media, although it does maintain a presence on LinkedIn and Facebook and will promote its Language Access services on those sites as it does its other programs and activities.

Physical notices will not be relevant other than signage will be posted indicating the availability of Language Access services for entrepreneurs with disabilities who are also LEPs at events such as the annual EDDIE Awards, a program of SSF's sister organization, Synergies Work.

In addition, agencies that refer clients to SSF will be advised of the availability of Language Access services.

And, lastly, SW's founder and CEO, Aarti Sahgal, is often called upon to speak at public/fundraising events and will make a point of mentioning the availability of Language Access services.

9. *How to monitor, evaluate, and update SSF's language access policy directives, plans, and procedures.*

SSF proposes to carry out these important functions in a manner consistent with the guidelines in the DOJ document, i.e., regular monitoring and annual reviews by an individual or group charged with the responsibility to ensure that SSF's Language Access Plan and Procedures are current and responsive to the changing needs (or numbers) of entrepreneurs who are disabled and LEP persons.

Further information about SSF's self-assessment is found in Appendix A.

C. SSF's Language Access Policy

SSF's Language Access Policy:

It is SSF's policy to provide persons with disabilities who are also LEP persons with timely meaningful access to all our programs and support. All team members shall ensure the provision of free language assistance services to persons with disabilities who are also LEP persons whom they encounter or whenever a person with disabilities who is also an LEP person requests language assistance services. All team members will inform members of the public that language assistance services are available free of charge to persons

with disabilities who are also LEP persons and that SSF will provide these services to them.

The purpose of this Policy is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, for SSF team members to follow when providing services to, or interacting with, persons with disabilities who are also LEP persons. Following these guidelines is essential to the success of SSF's mission to empower entrepreneurs with disabilities to address the unique challenges they face including limited access to capital and barriers to financial services.

Language assistance measures include (1) identifying and ensuring that vital documents are either available (translated) in the language of all persons with disabilities who are also LEP persons and/or support in their completing vital documents is available to persons with disabilities who are also LEP persons, (2) ensuring that persons with disabilities who are also LEP persons conducting person-to-person communications (telephone, videoconference) with SSF are supported by appropriate interpreters and written (email) communication is conducted in the language of the applicable person with disabilities who is also an LEP person (translation services).

Aarti Sahgal, founder and CEO (or her designate) has executive responsibility for the implementation, compliance, and monitoring of the Policy. Among Ms. Sahgal's responsibilities (or those of her (or her designate) is to ensure that staff members receive training to ensure they can effectively meet their responsibilities under this Policy. A further responsibility is to ensure that the number and frequency (and the languages) of contact between SSF and persons with disabilities who are also LEP persons are monitored and recorded and that the Plan is assessed annually and modified if/as required.

For the purposes of this Policy, a vital document is a document a person with disabilities who is also an LEP person must complete to apply for or receive support from SSF. Interpreters and translators are professional third parties retained by SSF to provide language access services on its behalf on an as-needed basis.

D. SSF's Language Access Implementation Plan

- *Identification of the person(s) charged with implementing the Plan*

SSF is a small charitable organization with fewer than five (5) permanent team members, including full-time and part-time staff. Therefore, it is appropriate that Aarti Sahgal, founder and CEO, has executive responsibility for the implementation, compliance, and monitoring of the Plan. If circumstances require or permit, Ms. Sahgal may appoint a designate (senior team leader) to oversee the day-to-day administration of the Plan.

- *Identification and assessment of SSF's LEP community*

As noted in the Assessment section of this document, SSF serves a niche community. Given that Synergies Work (SSF's sister organization) has not yet encountered an entrepreneur with disabilities who is also an LEP person, beyond the general statistical data available, SSF has little to go on. Therefore, ongoing reporting monitoring will be key.

In terms of reporting, SSF expects that resources beyond staff members recording and bringing forward interactions with entrepreneurs with disabilities who are also LEP persons when they occur will not be required.

Critical will be recording the number of entrepreneurs with disabilities who are also LEP persons from each language group (data collection). In view of SSF's size and the infrequency of interactions expected, data will be recorded on a spreadsheet.

Further, when SSF is likely to have repeated contact with an entrepreneur with disabilities who is also an LEP person, the team member will make appropriate notations in the person's file indicating the language spoken, and listing the language assistance tools requested and utilized.

In terms of providing the necessary interpretation and translating services, third-party provider(s) will be engaged. We have identified [Languages Unlimited](#) as appropriate to provide this service.

- *Timeframe, objectives, and benchmarks for implementation work to be undertaken.*

Given SSF's size and the infrequency of interactions expected, timeframes can be measured in days or weeks.

SSF will begin by ensuring that services from a third-party provider are available in Spanish.

Staff will be advised of the Policy and Plan immediately, and client-facing team members will be provided at that time with the procedure (outlined below) to be

followed when an entrepreneur with a disability who is also an LEP person comes forward. The procedure will be available to staff online and in paper form for handy access when they answer telephone calls or emails.

In terms of benchmarks, given SSF's size and the infrequency of interactions expected, team members will be asked to report interactions directly to Ms. Sahgal or her designate and comment anecdotally on the success or otherwise of the interaction with a view to improving the procedure.

We will obtain third-party support in languages other than Spanish from a professional interpretation/translation firm on a one-off or ad hoc basis until the number of those interactions at least matches the number of Spanish language interactions. We will use the services of [Languages Unlimited](#) for this purpose or another appropriate provider.

- *Identification of funding and procurement issues and the steps needed to address them.*

Funding and procurement issues are not anticipated at this time.

- *Notice of language assistance services*

SSF will take the following steps as soon as practicable to provide public notice that it provides Spanish, Vietnamese, Mandarin, and Cantonese language services free of charge to entrepreneurs with disabilities who are also LEP persons:

- Post notices to that effect on its website, initially in Spanish only, together with instructions on how entrepreneurs with disabilities who are also LEP persons should communicate their need for language services to SSF in the first instance. The notice will be in substantially this form: If you speak a language other than English, language assistance services, free of charge, are available to you. Please email to info@synergieswork.org or call (XXX) XXX-XXXX. [In Spanish: Si habla un idioma distinto del inglés, tiene a su disposición servicios de asistencia lingüística gratuitos. Envíe un correo electrónico a info@synergieswork.org o llame al (XXX) XXX-XXXX.]
- Post those notices in its LinkedIn and Facebook feeds, and on any other platforms it uses to promote its services. The frequency of those postings will vary with the number of posts in any given month, but the idea is that a user would not have to scroll too far to see one. On platforms where it is possible to do so (e.g., LinkedIn), the availability of language services will be indicated in SSF's profile in both English and the relevant language(s).

- Team members will be empowered and encouraged to advise representatives of agencies that provide services to persons with disabilities of the service so that those representatives are aware and can advise potential SSF clients. In that regard, we note the agencies listed and described here and here.
- Similar to the previous point, Ms. Sahgal or her designate will formally reach out to senior representatives of agencies that provide services to persons with disabilities and advise them that SSF now offers language services.
- Notices of the availability of language services will be posted prominently at public SW events such as the annual EDDIE Awards in both English and the relevant languages. Similarly, Ms. Sahgal and other SSF spokespeople will make specific mention of the service when publicly speaking and fundraising.
- *Training staff on policies and procedures*

Given the small number of SSF team members, training will be undertaken immediately by Ms. Sahgal or her designate in the course of regularly scheduled team meetings. Client-facing team members will be instructed to report on all interactions with entrepreneurs with disabilities who are also LEP persons as they occur. They will be instructed to send an “all-team-member” email regarding each interaction so that all team members will be aware of each individual’s language needs and to detail the interactions at regular team meetings.

- *Monitoring and updating the plan, policies, and procedures*

Monitoring and recording will be as previously described. Annual reviews of the Plan and Procedures will be undertaken by Ms. Sahgal or her designate with input from all team members. Ms. Sahgal may also consult with SSF’s third-party interpretation and translation service provider(s) and/or representatives of other agencies that provide services to SSF’s clients.

- *Collaborating with LEP communities and other stakeholders*

SSF and, in particular, Ms. Sahgal is not aware of a community of entrepreneurs with disabilities who are also LEP persons in Georgia, the South, or the Appalachian region. And, with her many years as an advocate for persons with disabilities, she believes she would know if such communities exist. (SW itself is ideally positioned to be a locus for such communities should they form.)

What SSF will do at its first opportunity, either Ms. Sahgal herself or a designate, is begin identifying and reaching out to LEP community representatives with a view to bringing SSF (and SW) to their attention so that they, in turn, can bring SSF (and SW) to the attention of members of their communities who might

qualify for, be interested in, and benefit from the programs and services offered by SSF (and SW). Opportunities for ongoing collaboration will be explored.

E. Language Access Procedures

- *Initial contact*

Initial contact is the point in time when an entrepreneur with disabilities who is also an LEP person has to convey to SSF both their interest in its programs and the fact that they need language services. Because SSF does not have physical premises, it will recommend on its website in English and (for now) Spanish that entrepreneurs with disabilities who are also LEP persons do one of three things:

1. Email SSF in their native language. This will identify for SSF the individual's language requirement.
2. Telephone SSF and communicate as best as they can that they need service in their native language and what that native language is. They will be instructed on the website to be prepared to provide their telephone number so that a return call can be made with the assistance of an interpreter.
3. Obtain the assistance of a bilingual family member, friend, or a staff member at an agency that provides services to them. Ask that family member, friend, or staff member to contact SSF and arrange a telephone call or videoconference with an interpreter present.

We note that the SSF website allows users to translate any page on the site to a foreign language using Google Translate.

4. *Note on Assistance for deaf entrepreneurs.* SSF currently provides American Sign Language interpretation services for deaf entrepreneurs accessing its services by way of ASL services from Sign! News. SSF has an agreement with Sign1 News (<https://sign1news.com>) for ASL interpretation.

- *Provision of Language Assistance Services*

SSF's Language Assistance Services will be provided by one or more professional (commercial) third-party interpretation and translation service providers with which SSF contracts.

The general procedure for team members when using an interpreter shall be:

- State the purpose of the communication and describe the type of information you may convey.

- Speak in short sentences, expressing one idea at a time, and allow the information to be interpreted.
- Address (speak to) the LEP client and not to the interpreter.
- Avoid using acronyms. If you must do so, please explain their meaning, providing brief explanations of technical terms.
- Occasionally ask if the interpreter understands the information or if you should slow down or speed up your speech. If the interpreter is confused, the client may also be confused.
- Occasionally ask if the LEP client understands the information. You may have to repeat or clarify some information by saying it in a different way.
- Be patient and thank the interpreter.

- *Training*

All staff members who may be called upon to carry out client-facing duties will be trained on SSF's Language Access Procedures. Unfortunately, it is not feasible for SSF to hire team members specifically to serve entrepreneurs with disabilities who are also LEP persons. When hiring in the future, fluency in a second language will be identified as preferred but not essential.

- *SSF's procedures (timing, etc.) to monitor, evaluate, and update its Language Access Policy, Plan, and Procedures.*

Client-facing team members will be instructed to record in a spreadsheet designated for that purpose and report on all interactions with entrepreneurs with disabilities who are also LEP persons as they occur. They will be instructed to send an "all-team-member" email regarding each interaction so that all team members will be aware of each individual's language needs and to detail the interactions at regular team meetings.

Annual reviews of the Plan and Procedures will be undertaken by Ms. Sahgal or her designate with input from all team members. Ms. Sahgal may also consult with SSF's third-party interpretation and translation service provider(s) and/or representatives of other agencies that provide services to SSF's clients.

- *Translation of documents.*

The only vital document is SSF's application for funding form.

SSF will have a Spanish version of that form created and available. SSF will then have the completed form (and supporting documentation, as required) translated into English for review and processing by a third-party translator.

When the form is required for the first time in other languages, it will be translated and made available as required and then available going forward.

- *Processing language access complaints*

Complainants will be directed in the first instance to Ms Sahgal who will make all reasonable efforts to resolve the complaint.

If Ms.Sahgal is unable to resolve the complaint within a reasonable period of time, the complainant will be advised that they may a complaint to the Department of the Treasury, Office of Equal Opportunity and Diversity, 1750 Pennsylvania Avenue, NW., Room 8157, Washington, DC 20220.

- *Language Access Coordinator*

Aarti Sahgal, SSF founder and CEO, is the Language Access Coordinator unless and until she appoints a designate. At all times, Ms. Sahgal retains executive responsibility for the Plan and Procedures.

- *Community Outreach and Disseminating Language Assistance Services Information*

SSF will at its first opportunity, either Ms. Sahgal herself or a designate, begin identifying and formally reaching out to LEP community representatives with a view to bringing SSF (and SW) to their attention so that they, in turn, can bring SSF (and SW) to the attention of members of their communities who might qualify for, be interested in, and benefit from the programs and services offered by SSF (and SW). Opportunities for ongoing collaboration will be explored.

APPENDIX A SELF-ASSESSMENT

Introduction

SSF has conducted an individualized assessment to assess the needs of individuals with limited English proficiency (“LEP”) served. In doing so, it has balanced the following four factors:

- (1) The number or proportion of people with limited English proficiency (here, “LEP persons”) eligible to be served or likely to be encountered;
- (2) the frequency with which LEP persons come in contact with SSF
- (3) the nature and importance of SSF’s program, activity, or service; and
- (4) SSF’s available resources.

Number and Proportion of LEP Persons Eligible to be Served or Likely to be Encountered

SSF first considered the number or proportion of LEP persons from a particular language group served or encountered in the SSF-eligible service population. The greater the number or proportion of these LEP persons, the more likely language services are needed. Initially, SSF plans to target Georgia and the South Appalachian region.

To determine the number of LEP persons within the service area, the SSF first examined its own LEP encounters with regards to its sister organization - **Synergies Work (www.synergieswork.org)**. There have been few in number. The staff of Synergies Work who run various cohorts and programs report no contacts with LEP persons in the past 7 years.

SSF has reviewed U.S. Census Bureau data from the American Community Survey provided at www.lep.gov.

The Civil Rights Division’s Language Map App on that site is an interactive mapping tool that helps users find out the concentration of and languages spoken by LEP individuals in a community. The Census estimates that 371,393, or 7.6 percent of Georgians, have Limited English Proficiency (LEP), About 56.7 percent of LEP persons speak Spanish, followed by Vietnamese (6 percent), Korean (5.8 percent) and Chinese (5.4 percent). In 2021 2.74% of the households in Kentucky reported speaking Spanish at home as the primary shared language between all members living in the household. Similarly, in Alabama the 3.3% reported Spanish speaking population.

Frequency with which LEP persons come in contact with SSF

As is discussed above, people with LEP come into contact with SSF infrequently. The majority of contacts are with members of the public who contact SSF via our website. Since we don’t have a physical location, members of the public who are LEP or otherwise do not meet us in person. Others SSF may encounter include people who come to public forums, events, and meetings where SSF staff are present.

Nature and importance of the SSF's program, activity, or service

The mission of SSF is to provide accessible and affordable financial support to founders with disabilities. The organization's expressed goal is to serve those who are being left out of the mainstream economy. Therefore, it is very important that people who contact SSF are able to access our information and resources without barriers. If LEP people are unable to access SSF Fund financing, technical assistance, or other services because of our inability to communicate, it will interfere with our ability to equitably serve all.

SSF's available resources

SSF will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities. We will, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in all our programs. This includes qualified sign language interpreters, accessible documents that are screen reader friendly, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

SSF has limited available resources to pay for language assistance services. Therefore, SSF has made arrangements with an interpretive service that is intended to be able to meet almost any individual need for language services on demand.

APPENDIX B

ADDITIONAL MATTERS

Interpreters for hearing or speech disabilities

a. For telephone calls only, via Relay Service. The federal and state governments have established free Relay services to provide persons with communication disabilities access to landline phone service. This service can be accessed by dialing 711 or via the Internet. 711 automatically connects to a relay operator. The service allows consumers to use specialized equipment (such as captioned telephone, TTY, VCO, or HCO) to communicate with standard voice telephone users through specially trained relay operators.

b. For video or in-person communication, the Telelanguage service described above may be used. The SSF Zoom account may also be used with closed captioning.

SSF staff will use either the Telelanguage line or Relay Service as follows:

- When it is not possible to communicate effectively with a person on the telephone or when the caller requests an interpreter;
- To identify the language being spoken by an individual if unable to do so in another fashion; and
- In order to communicate that an appointment will be set up and an interpreter provided. Staff who frequently answer the phone and who perform outreach activities will keep a copy of the Telelanguage information near their phone and will utilize it when using telephone interpreting. Staff will document all attempts to make interpretation arrangements and may track data using the Interpreter/Translator Requests Documentation Form created for that purpose.

Wherever required SSF can access **ASL services from Sign! News. SSF has an agreement with Sign1 News (<https://sign1news.com>) for ASL Interpretation.**