









**Impact
Development
Fund**

Policy Title:	Title VI Policy		
Effective Date:	December 4, 2024		
Revision Dates:	N/A		
Approval:	<table border="0"><tr><td style="text-align: center;">Signed by:  2ED08FC331A54AD... Becky Christoffersen, IDF Board President</td><td style="text-align: center;">Signed by:  2821559C119F49C... Megan Ferguson, IDF Chief Executive Officer</td></tr></table>	Signed by:  2ED08FC331A54AD... Becky Christoffersen, IDF Board President	Signed by:  2821559C119F49C... Megan Ferguson, IDF Chief Executive Officer
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TITLE VI Policy

Responsibilities:

Chief Operating Officer responsible for policies/procedures;

Chief Administration Officer responsible for implementation



I. Non-Discrimination Policy Statement

It is the policy of Impact Development Fund (IDF) that no person shall on the grounds of race, color, national origin, sex, disability, religion, sexual orientation, or age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of Impact Development Fund as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

This policy applies to all operations of Impact Development Fund including, but not limited to, its employees, contractors and anyone who acts on behalf of Impact Development Fund. This policy also applies to the operations of any department or agency to which Impact Development Fund extends federal financial assistance.

Prohibited discrimination may be intentional or unintentional. Seemingly neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color, national origin, sex, disability, religion, sexual orientation, or age include: Denial to an individual any service, financial aid, or other benefit; Distinctions in the quality, quantity, or manner in which a benefit is provided; Segregation or separate treatment; Restriction in the enjoyment of any advantages, privileges, or other benefits provided; Discrimination in any activities related to highway and infrastructure or facility built or repaired; and Discrimination in employment.

Title VI compliance is a condition of receipt of federal funds. The Title VI Coordinator is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 U.S.C § 2000d and related statutes, and the requirements of 23 Code of Federal Regulation (CFR) Part 200 and 49 CFR Part 21.

Megan Ferguson, Chief Executive Officer

Date

Appendix A: Impact Development Fund Non-Discrimination Policy and Notice of Rights



II. Organization, Staffing, and Structure

Impact Development Fund's Title VI Coordinator is responsible for assuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related statutes and has directed that non-discrimination is required of all agency employees, contractors, and agents pursuant to 23 CFR Part 200 and 49 CFR Part 21.

The position of Title VI Coordinator is within the Chief Administrative Officer role.

The Title VI Coordinator is responsible for:

- Submitting a Title VI plan and annual reports on the agency's behalf;
- Developing procedures for the prompt processing and disposition of complaints;
- Investigating complaints, compiling a complaint log, and reporting to IDF.
- Developing procedures for the collection and analysis of statistical data.
- Developing a program to conduct Title VI reviews of program areas;
- Conducting annual Title VI assessments of pertinent program areas;
- Developing Title VI information for dissemination;
- Establishing procedures for resolving deficiency status and reducing to writing the remedial action agreed to be necessary.

Appendix B: Organizational chart



III. Primary Program Area Descriptions & Review Procedures

Impact Development Fund engages in the following program areas:

Program Area	General Description	Title VI/Non-Discrimination Concerns and Responsibilities	Review Procedures for Ensuring Non-Discrimination
Financing Affordable Housing Initiatives	Loan origination, underwriting, funding, servicing, etc. for established loan products supporting the development, preservation, and rehabilitation of multifamily affordable housing.	High customer contact positions: Loan Officers, Loan Servicers, 504 Coordinator. Customer Service/Satisfaction	Staff training annually: Limited English Proficiency Plan, Affirmative Fair Housing Marketing Plan, Fair Housing, ADA compliance
Clean Energy Program Administration	Application intake, project underwriting, closing/funding, servicing, and ongoing compliance.	High customer contact positions: Loan Officers, Loan Servicers, 504 Coordinator. Customer Service/Satisfaction	Staff training annually: Limited English Proficiency Plan, Affirmative Fair Housing Marketing Plan, Fair Housing, ADA compliance
Lottery and Deed Restriction Management	Lottery application intake and eligibility, on-going deed restriction compliance, etc.	High customer contact positions: Eligibility Specialist Customer Service/Satisfaction	Staff training annually: Limited English Proficiency Plan, Affirmative Fair Housing Marketing Plan, Fair Housing, ADA compliance
Development	Development of affordable units	Engage Community input Address Community Concerns	Staff training annually: Limited English Proficiency Plan, Affirmative Fair Housing Marketing Plan, Fair Housing, ADA compliance
Program Management	Third-party consumer and commercial loan origination, loan servicing, escrow management, accounting and reporting functions, etc.	High customer contact positions: Loan Officers, Loan Servicers, 504 Coordinator. Customer Service/Satisfaction	Staff training annually: Limited English Proficiency Plan, Affirmative Fair Housing Marketing Plan, Fair Housing, ADA compliance



IV. Title VI Complaint Process and Procedure

Impact Development Fund operates without regard to race, color, national origin, age, sex, religion, sexual orientation, or disability and provides equal access to its programs and services to all members of the public. The following information serves to inform the public of its right to this access, and to educate members of the public so that they may understand their rights under the civil rights law which protects the receipt and benefit of services as defined by Title VI of the Civil Rights Act of 1964.

For information on Title VI complaint and investigation procedures, or to fill out a Title VI complaint form, please see the following Title VI Complaint and Investigation Procedures. To obtain more information on the IDF's non-discrimination obligations, please submit a written request to: Impact Development Fund, Attn: Title VI Coordinator, 200 E. 7th Street, Suite 412; Loveland, CO 80537.

Title VI Complaint and Investigation Procedures:

The following procedures cover complaints filed under Title VI of the Civil Rights Act of 1964 for alleged discrimination in any program or activity administered by IDF. These procedures do not affect the right of the Complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and IDF may be utilized for resolution. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file a written complaint, preferably using IDF's Title VI Complaint Form, and send it to the following:

Impact Development Fund
Attn.: Title VI Coordinator
200 E. 7th Street; Suite 412;
Loveland, CO 80537
Phone: (970) 494-2021

The following measures will be taken to resolve Title VI complaints:

1. A formal complaint must be filed within one-hundred eighty (180) calendar days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the Complainant's name, address and telephone number; name of the alleged discriminating person(s), basis of complaint (race, color, national origin, religion, sexual orientation), and the date of the alleged act or acts. A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints. A copy of the form can be found on Impact Development Fund's website or may be requested by writing to the Title VI Coordinator at the address listed below. IDF encourages individuals to submit Title VI complaints in writing using this form and mailing to:

Impact Development Fund
Attn.: Title VI Coordinator
200 E. 7th Street; Suite 412;
Loveland, CO 80537



2. In the case where a Complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Impact Development Fund Title VI Coordinator. Under these circumstances, the Complainant will be interviewed, and the Coordinator will assist the Complainant in converting the verbal allegations to writing.
3. When a complaint is received, the Coordinator will provide written acknowledgment to the Complainant within ten (10) calendar days by registered mail.
4. If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided sixty (60) calendar days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.
5. Within fifteen (15) calendar days from receipt of a complete complaint, Impact Development Fund will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) calendar days of this decision, the Title VI Coordinator or his/her authorized designee will notify the Complainant and Respondent, by registered mail, informing them of the disposition.
 - a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
 - b. If the complaint is to be investigated, the notification shall state the grounds of IDF's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting in the investigation.
6. When IDF does not have sufficient jurisdiction, the Title VI Coordinator or his/her authorized designee, will refer the complaint to the appropriate State or Federal agency holding such jurisdiction.
7. If the complaint has investigative merit, the Title VI Coordinator or his/her authorized designee will assign an investigator. A complete investigation will be conducted, and an investigative report will be submitted to the Title VI Coordinator within sixty (60) calendar days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations and conciliatory measures where appropriate. If the investigation is delayed for any reason, the investigator will notify the appropriate authorities, and an extension will be requested.
8. The Title VI Coordinator or his/her authorized designee will issue letters of finding to the Complainant and Respondent within ninety (90) calendar days from receipt of the complaint.
9. If the Title VI Coordinator's final response does not satisfactorily resolve the matter, the Complainant or Complainant's authorized representative may appeal the decision of the Title VI Coordinator, in writing, to the Chief Executive Officer, Impact Development Fund, 200 E. 2nd Street, Suite 412; Loveland, CO 80537. The Complainant shall file his or her appeal, including a detailed description of its basis, no later than thirty (30) calendar days after the date of the Title VI Coordinator's final written response.
10. Records of complaints will be retained by IDF for a minimum of three years.

Spanish and English versions shall be posted in a public location at all IDF properties.



V. Title VI Complaint Form- English

Title VI Civil Rights Complaint Form

Instructions: To Submit a Title VI complaint to Impact Development Fund, please print and complete the following form, sign and return to: Impact Development Fund, Title VI Coordinator, 200 E. 7th St, Suite 412; Loveland, CO 80537. For additional information or questions, please contact our Title VI Coordinator at HR@impactdf.org or call 970-494-2021.

Section I

Name: _____
Address: _____
Phone numbers: _____
Home _____
Work _____
E-mail _____

Accessible Format Requirements?

Large Print: Audio tape: TDD:

Other: _____

Section II

Are you filing this complaint on your own behalf? Yes No

[If you answered "yes" to this question, go to Section III.] If not, please supply the name and relationship of the person for whom you are complaining:

Please explain why you have filed for a third party. _____

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. Yes No

Section III

I believe the discrimination I experienced was based on (check all that apply):

___ Race ___ Color ___ National Origin ___ Age ___ Sex ___ Disability ___ Religion ___ Sexual orientation

Date of Alleged: Discrimination (Month, Day, Year): _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

Section IV

Have you previously filed a Title VI complaint with this agency? Yes No



Section V

Have you filed this complaint with any other Federal, State or local agency or with any Federal or State court? Yes No

Federal Agency _____

State Agency _____

Federal Court _____

Local Agency _____

State Court _____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____

Title: _____

Agency: _____

Address: _____

Phone: _____

On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations.

Please also provide any other documentation that is relevant to this complaint.

Signature _____ Date _____

[Note - We cannot accept your complaint without a signature.]

Please mail your completed form to:

Impact Development Fund

Attention: Title VI Coordinator

200 E. 7th St., Suite 412 Loveland, CO 80537

Spanish and English versions shall be posted in a public location at all IDF properties.



VI. Data Collection

Program Area	Type of Data Collected & Process for Collecting	Intended Outcome of Data Analysis (i.e. Title VI Purpose for Collecting the Data)
Applicant/ Borrower Records	Demographic data for applicants and borrowers. Application form, loan documents. Includes, household, income, and race demographics.	Tracking of race/ethnicity of participants and beneficiaries of IDF programs and activities.
State of Colorado	Demographic data for the State of Colorado. Includes US Census demographics.	Tracking of race/ethnicity of potential participants and beneficiaries of IDF programs and activities.
Nationwide	Demographic data for other applicable states. Includes US Census demographics.	Tracking of race/ethnicity of potential participants and beneficiaries of IDF programs and activities.

Sources of Information:

<https://www.huduser.gov/portal/datasets/il.html>

<https://geomap.ffiec.gov/ffiecgeomap/>



VII. Public Participation

Impact Development Fund utilizes (but is not limited to) the following resources for public outreach:

Social media outlets
Impact Development Fund website

Impact Development Fund's Affirmative Fair Housing Marketing Plan (AFHMP) is a marketing strategy designed to attract applicants of all majority and minority groups. This Plan describes targeting, outreach, indicators and training. Statutory authority for AFHMP's derives from:

- Fair Housing Act (Title VIII of the Civil Rights Act of 1968)
- Section 504 of the Rehabilitation Act of 1973; and
- Title VI of the Civil Rights Act.

Appendix C: Impact Development Fund Affirmative Fair Housing Marketing Plan

VIII. Notice of Rights

Notice of Rights is posted at each Impact Development Fund property in both English and Spanish, included in the application process, and posted in the reception/front desk area of Impact Development Fund's main office.

Your Rights Against Discrimination under Title VI of the Civil Rights Act of 1964

Impact Development Fund operates its programs and services without regard to race, color, national origin, sex, age, religion, sexual orientation, and disability. In accordance with the Impact Development Fund's Complaint Process and Procedure, if any person believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any Impact Development Fund program or activity because of their race, color, national origin, age, sex, religion, sexual orientation or disability may file a discrimination complaint with Impact Development Fund or the Colorado Division of Civil Rights.

To file a Title VI discrimination complaint, contact:

Impact Development Fund
Attn.: Title VI Coordinator
200 E. 7th Street, Suite 412, Loveland, CO 80537
(970) 494-2021
HR@impactdf.org

Colorado Department of Regulatory Agencies
Colorado Division of Civil Rights
1560 Broadway, Suite 825
Denver, CO 80202
(303)894-2997
Hotline Espanol: (720)432-4294
dora_CCRD@state.co.us

Spanish and English versions shall be posted in a public location at all IDF properties.

Appendix A: Impact Development Fund Non-Discrimination Policy and Notice of Rights



Appendix A

Impact Development Fund Non-Discrimination Policy and Notice of Rights

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This policy applies to all operations of Impact Development Fund including, but not limited to, its employees, contractors and anyone who acts on behalf of Impact Development Fund. This policy also applies to the operations of any department or agency to which Impact Development Fund extends federal financial assistance. Federal financial assistance can include but is not limited to: HUD Housing Choice Vouchers, HUD Multi-family contracts, LIHTC, USDA-RD, and HOME funds.

Prohibited discrimination may be intentional or unintentional. Seemingly neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color, national origin, sex, disability, religion, sexual orientation, or age include: Denial to an individual any service, financial aid, or other benefit; Distinctions in the quality, quantity, or manner in which a benefit is provided; Segregation or separate treatment; Restriction in the enjoyment of any advantages, privileges, or other benefits provided; Discrimination in any activities related to highway and infrastructure or facility built or repaired; and Discrimination in employment.

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(970) 494-2021
HR@impactdf.org

Colorado Department of Regulatory Agencies
Colorado Division of Civil Rights
1560 Broadway, Suite 825
Denver, CO 80202
(303)894-2997
Hotline Espanol: (720)432-4294
dora_CCRD@state.co.us



Appendix B
Impact Development Fund Organizational Chart



FTE: 53
 PTE: 0
 TBD FTE: 55

IDF Board of Directors

Finance Committee

Megan Ferguson
 Chief Executive Officer

Erica Madison
 Chief Lending Officer (CLO)

Justin Hill
 Director of Clean Energy Lending

Marcia Myers
 Director of Finance

Rachel Tweedy
 Chief Operating Officer (COO)

Katherine Palmer
 Director of Contracting

Connie Ealey
 Chief Administrative Officer (CAO)

Impact Development Builders (IDB)

Aaron Ferguson
 Chief Construction Officer (CCO)

Marcus McKinney
 Sr. Commercial Underwriter

Ross Valdez
 Director of Third-Party Lending

Colton Clarke
 Credit Analyst

Nathan Kleist
 Credit Analyst

Jennifer Nord
 Credit Analyst

Commercial

Alex Dea
 CE Underwriter

Ty Wills
 CE Specialist

Retail

Coren Hanscome
 Consumer CE Mgr.

Jessica Taft
 Director of Loan Administration

Gina Winterhalter
 Controller

Richard Martinez
 Finance Specialist

Wei Zeng
 Staff Accountant I

Rohana Parks
 HR Manager

TBD Ops Specialist

Tyson Eyre
 BI Engineer

Bryn DeMarois
 Marketing & Comms.

Michael DeSantis
 Tech. Ops. Specialist

TBD Governance Coordinator

Erica Hall
 Reporting Spec.

Mike Harper
 Construction Manager

Travis Lundahl
 Construction Specialist

Cooper Bobo
 Carpenter / Framer

Parker Bobo
 Carpenter / Framer

Jamie Daniels
 Funding Specialist

Jake Martin
 Loan Svs. Specialist

Linnea Sherwood
 Loan Svc. Specialist

Amber Florence
 Loan Svc. Mgr.

Adam Harris
 Retail Asset Mgr.

April Talbot
 Commercial Asset Mgr.

Emily Nilsen
 Director of Community Initiatives

DR Closeout

Jamila Pierson
 CFBC Lead

Misty Mallonee
 HRP Lead

Indya Akbar
 DR. Specialist

Michelle Moulton
 DR Specialist

Kevin Holt
 DR Closer

Rachel Haynes
 DR Specialist

Mesia Sipes
 DR Specialist

Scott LeJeune
 DR Specialist

Caley Griffin
 Program Admin. Mgr.

Jim Kolnik
 Impact Dev. Svc.

Kathy McKinney
 Retail Team Lead

Elizabeth Deleone
 Small Dollar Program Mgr.

Gwen Borrego
 Retail Loan Specialist

Kristin Fewell
 Retail Loan Specialist

Karen Hancock
 Retail Loan Specialist

Karen Hucke
 Retail Loan Closer

Kelli Despain
 Retail Loan Specialist

Appendix C

Affirmative Fair Housing Marketing Plan

1. PURPOSE

The purpose of this AFHMP is to outline strategies for promoting fair and equal housing opportunities and to attract applicants who are least likely to apply for housing assistance without special outreach efforts. This plan aligns with HUD's goals of eliminating discriminatory practices in housing and fostering inclusivity in the communities we serve. Statutory authority for AFHMP's derives from:

- Fair Housing Act (Title VIII of the Civil Rights Act of 1968)
- Section 504 of the Rehabilitation Act of 1973; and
- Title VI of the Civil Rights Act.

2. REQUIREMENTS

Subsidized and unsubsidized multifamily housing with five or more units must complete an AFHMP. A Multifamily property owner must review an existing AFHMP when

- At least five years have elapsed since the last review;
- the local jurisdiction's Consolidated Plan has been updated; or
- significant demographic changes have occurred in the housing market.

An AFHMP should only be submitted to Fair Housing & Equal Opportunity (FHEO) for review and approval if:

- Impact Development Fund (IDF) determines that the population "least likely to apply" for housing is not identified in the existing AFHMP; or
- existing advertising, publicity, or outreach are no longer appropriate and require modification or expansion.

If an owner's review concludes that an existing AFHMP is satisfactory, it does not have to be submitted to FHEO. However, a copy should be maintained and be available to the public.

3. NONDISCRIMINATION

With respect to the treatment of applicants, Impact Development Fund will not discriminate against any individual or family because of race, color, religion, sex, familial status, national origin, or handicap.

4. TARGETING

Impact Development Fund will direct marketing efforts toward groups identified as least likely to apply, determined through market data, census information, and a review of local community needs.

5. OUTREACH

- A. All advertising shall display the Equal Housing Opportunity logo or the phrase "Equal Housing Opportunity."
- B. Special marketing outreach consideration will be given to the following underserved populations:
 - a. Racial/Ethnic Minorities
 - b. Non-English Speakers
 - c. Persons with Disabilities



- C. Marketing shall include the use of Community Partnerships and Online / Social Media Outreach. Partnerships with community-based organizations will help disseminate information through trusted community channels. Digital platforms will be used to engage broader audiences.
- D. IDF will contact local civic and community organizations representative of the ethnic and cultural diversity of the area in order to disseminate information about the available housing. Groups representing the handicapped and the elderly will also be contacted. Where necessary, IDF will publish its marketing materials in Spanish in order to better reach potential applicants in the area with language limitations.

6. INDICATORS TO MEASURE SUCCESS

- A. The Pre-application will ask how the applicant heard about IDF.
- B. IDF will compare inquiries for applicants "least likely to apply" prior to and after marketing.
- C. IDF shall establish and maintain an Affirmative Marketing folder to hold advertisements, flyers, and other public information documents to demonstrate that the appropriate logo and language have been used. Additionally, IDF shall keep records of its activities in implementing the affirmative marketing plan i.e. other community outreach efforts.
- D. IDF shall keep info based on census data, applications, and records about applicant loan approval or rejection.

7. TRAINING

- A. IDF shall provide staff educational opportunities to relevant regulations and Fair Housing provisions. IDF staff are required to take Fair Housing or related educational classes yearly.

