



LACAHSR Renter Protection and Homelessness Prevention (RPHP) Program

Guidelines

**San Gabriel Valley Council of Governments
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Overview and Purpose

The San Gabriel Valley Council of Governments (“SGVCOG”) Renter Protection and Homelessness Prevention (“RPHP”) Program – SGV Home (“Program”) – was established in 2026 using Measure A RPHP funds allocated to the SGVCOG by the Los Angeles County Affordable Housing Solutions Agency (“LACAHSAs”). LACAHSAs’s RPHP funding is designed to advance Measure A Goal 4 – preventing renter households from falling into homelessness – through the delivery of a suite of services, including coordinated renter protection education and legal services, homelessness prevention services, and targeted financial support.

The SGVCOG’s SGV Home Program was designed in accordance with the LACAHSAs FY 2025-26 Transitional Guidelines (“Transitional Guidelines”). These Program guidelines are intended to serve as a practical, step-by-step tool for providers, outlining how SGVCOG and its partners envision the RPHP Program to function, and will be referenced for implementation and updated on an as-needed basis. The SGVCOG RPHP uses a case management and problem-solving framework to connect eligible households to targeted financial assistance, legal interventions, and renter education to stabilize their housing and prevent displacement.

This design guides the purpose, program implementation, provider roles, and service delivery standards outlined in the sections that follow. **The purpose of these Guidelines is to ensure that each client receives the same level and high quality of service regardless of which partner with which the client is working.**

Program Components

The SGV Home Program includes several components that are aligned with the eligible activities defined in the Transitional Guidelines.

- ***Marketing, Assessment, Eligibility, and Referral:*** These activities provide marketing, assessment, eligibility, and referral services that connect households to assistance. SGV Home has a standardized assessment and referral method to ensure that all eligible households have equitable access to resources and to prioritize households that are more likely to fall into homelessness. All households that meet the eligibility criteria are eligible for this resource.
- ***Legal Services and Renter Education:*** These activities include holistic legal representation, mediation, and housing-focused case management to address legal and related issues that affect a household’s ability to remain housed, such as eviction defense, benefits appeals, clearing records, and other housing-related legal matters. All households that meet the eligibility criteria are eligible for this resource.

SGV Home also includes monthly renter education workshops that include a walk-in clinic for attendees to have specific legal questions addressed. Any San Gabriel Valley resident may attend the renter education workshops.

- **Financial Assistance, within the following categories:**

<i>Program</i>	<i>Eligible Expenditures</i>	<i>Additional Eligibility Requirements</i>	<i>Funding Limitations</i>
Emergency Rental and Flexible Financial Assistance	Housing-related costs, including rental assistance and arrears, utilities, move-in and relocation expenses, essential household needs, and other housing stability expenses such as transportation, healthcare, food, and short-term vocational training	Household cannot be living in subsidized housing (e.g. time-limited subsidies (TLS), rapid re-housing, other Temporary Rental Assistance Programs)	Rental Assistance may not exceed 6 months, authorized 1 month at a time (excluding rental arrears)
Temporary Rental Assistance	Covers rental and utility assistance; may be used as step-down support for households exiting time-limited or permanent subsidy programs	Household may be living in subsidized housing (e.g. TLS; rapid re-housing; other Temporary Rental Assistance Program)	Up to 6 months of assistance, authorized 1 month at a time
Short-Term Income Support	Direct payments to eligible households to help meet basic needs during temporary financial instability	Must have a documented housing crisis that cannot be resolved without short-term income support	Up to 18 months of assistance, authorized 1 month at a time Assistance may not exceed \$2,000 per month

A household may not receive more than \$36,000 in Financial Assistance in a 24-month period. After reaching either the assistance limit of \$36,000 or the time limit of 24 months, a household must wait at least 6 months before receiving additional assistance.

Individuals and families may receive either Emergency Rental and Flexible Financial Assistance OR Temporary Rental Assistance but cannot receive both during the same 24-

month period of assistance. Individuals and families who do receive approval to receive Emergency Rental and Flexible Financial Assistance or Temporary Rental Assistance may also receive Short-Term Income Support independently based on the needs identified in the intake and assessment of the household.

Program Eligibility

The LACAHSAs Transitional Guidelines establish the client eligibility criteria for LACAHSAs RPHP funding. As such, SGV Home has established the following eligibility criteria, consistent with the Transitional Guidelines:

- Must have an income of 80% or less of the area median income (AMI) over the last 90 days;
- Must be a renter, whether with a written lease, verbal agreement, or other informal arrangement conferring rights of tenancy;
- Must have experienced an event over the last 12 months that has resulted in the household being at risk of homelessness.

To be eligible for SGV Home funds, a household must reside in the San Gabriel Valley. A list of eligible cities and zip codes can be found in Attachment A.

Individuals and families who are experiencing homelessness or own a home, or have a mortgage, are not eligible for assistance.

SGV Home Program Design

There are four major components of the SGV Home Program:

- *Financial Assistance:* Each eligible client can receive Financial Assistance to prevent them from falling into homelessness. Financial Assistance may be one-time, or it may be ongoing, subject to the Program limits. Financial Assistance shall always be paired with Case Management (described in more detail below) and shall be provided based on the needs of the individual/household, determined through problem-solving conversations. The goal of the SGV Home Program is to combine financial assistance with problem solving and case management in order to provide the minimum amount of Financial Assistance necessary to prevent the individual/household from falling into homelessness. Financial Assistance can be provided in one of three categories and is time-limited, with maximum participation periods defined by assistance type and program guidelines (described above in the “[Program Components](#)” section).
- *Case Management:* Each client that receives Financial Assistance shall also receive Case Management that matches the duration of time for which they are receiving Financial Assistance. For example, if a client receives Financial Assistance for 3 months, they shall also be required to participate in Case Management for 3 months. The goal of the case management is to conduct problem solving conversations, understand the needs of the client, provide tools and support to help ensure that the client is able to remain stably housed after their participation in the Program ends, and provide ongoing support for the client throughout their enrollment. A client must be enrolled in the SGV Home Program in order to receive Financial Assistance.

- *Legal Services:* Each eligible client can receive Legal Services to prevent them from falling into homelessness. These legal services will be specifically identified and provided based on the needs of the specific client. These could range from support in addressing minor legal issues to providing legal defense when a client is facing eviction from their unit. Clients may also receive financial assistance to resolve any legal settlements. In some instances, a client receiving Legal Services may also be receiving Case Management and Financial Assistance (that is not related to a legal settlement).
- *Renter Education:* SGV Home holds monthly renter education workshops that will educate tenants on their rights and also provide a “walk-in clinic” in which tenants in need can seek guidance and support. A client does not have to be enrolled in SGV Home in order to receive Renter Education. All SGV residents can attend a Renter Education workshop.

Implementation Approach

The SGVCOG is contracting with participating service providers to implement the SGV Home Program. These service providers are responsible for marketing and outreach, receiving and evaluating referrals, verifying eligibility and enrolling eligible clients, providing outgoing case management, providing the necessary SGV Home services (e.g. legal services; financial assistance); and exiting clients. These service providers are responsible for implementing the SGV Home Program consistently with the guidelines. There are two types of service providers:

- Financial Assistance Service Provider (“Service Providers”): Responsible for implementing the Financial Assistance and Case Management components of the Program.
- Legal Service Service Provider (“Legal Services Provider”): Responsible for implementing the Legal Services and Renter Education components of the Program.

Table 1 (below) summarizes the implementer of each Program component.

Table 1. Program Implementation Approach

Implementer	Program Component			
	Financial Assistance*	Case Management	Legal Services	Renter Education
Service Provider	X	X		
Legal Services Provider			X	X

*NOTE: Financial Assistance shall always be paired with Case Management. For the purposes of these Guidelines, the term “Financial Assistance” will include both the Financial Assistance and Case Management components of the Program.

The Service Provider(s) and the Legal Services Provider(s) collectively are known as the Providers.

Financial Assistance & Case Management

SGV Home uses a slot-based system to manage enrollment in SGV Home. Each eligible client that completes the enrollment process shall be enrolled in a slot, which will provide them access to Financial Assistance and Case Management (“Financial Assistance Slot”). Clients must meet all [eligibility criteria](#).

Contracted Case Managers from the Service Providers are responsible for providing the required [Case Management](#) and evaluating and determining the enrolled client’s Financial Assistance needs based on problem-solving conversations.

Based on annual funding availability, the SGVCOG will determine the number of Financial Assistance Slots available for the upcoming year and will contract with Service Provider(s) to manage a specific number of Financial Assistance Slots. Service Providers will be selected using a competitive process.

If the SGVCOG contracts with multiple Service Providers (as is expected), the SGVCOG will allocate Financial Assistance Slots across the Service Providers based on organizational capacity, geographic coverage, and experience serving populations at heightened risk of homelessness, including priority populations identified by the program. Each contracted Service Provider is responsible for ensuring that these Guidelines are correctly implemented. While each Service Provider is expected to track the availability of their own slots, the SGVCOG will maintain the master list that tracks slot availability.

Each full-time case manager shall maintain a caseload of 20 households. Each Service Provider must provide the SGVCOG with a list of all assigned full-time case managers. Within 90 days of Program launch, each Provider must have at least 90% of their slots filled. If this target is not met, Provider must have a written plan for resolution.

To maximize responsiveness to the SGVCOG’s member cities, the SGVCOG shall assign a group of cities to each Service Provider. Each Service Provider is responsible for serving as the Program liaison for those cities, which includes responding to Program questions, accepting Program referrals, and generally serving as a resource for those cities. Each Service Provider’s city assignments can be found in Attachment B. As funding permits, additional “flex” Service Provider(s) may be contracted to expand slot capacity.

Legal Services

The Legal Services Provider is responsible for implementing this Program component. Clients with immediate legal needs will be referred to the Legal Services Provider. The Legal Services Provider will be responsible for providing legal services based on the client’s needs and the availability of resources. This could include addressing minor legal issues (e.g. credit needs) or providing legal representation for clients at-risk of eviction. The Legal Services Provider will also have access to funding that can be used to pay for legal settlements on behalf of the assigned client.

In some instances, the Legal Services Provider may either receive referrals from the Service Providers, or may refer clients to the Service Providers. Clients may receive both Legal Services

and Financial Assistance; however, they may not receive funding that exceeds the Financial Assistance funding caps defined in the [Program Components](#) section of this document.

Renter Education

The Legal Services Service Provider is responsible for implementing this Program component. This includes providing renter education workshops and walk-in clinics to support clients that are at-risk of falling into homelessness and trying to address specific related issues.

Attendees of the Renter Education Workshops are not required to meet the Program eligibility.

Prioritization

The Transitional Guidelines require that each RPHP Program establish prioritization criteria for serving clients. Clients shall be prioritized into the following prioritization categories based on the following criteria:

Table 2. Prioritization Criteria.

Low Prioritization	Medium Prioritization	High Prioritization
<ul style="list-style-type: none"> ● Households that meet eligibility requirements 	<ul style="list-style-type: none"> ● Households that meet eligibility requirements AND 	<ul style="list-style-type: none"> ● Households that meet eligibility requirements AND
	<ul style="list-style-type: none"> ● Households currently at or below 50% AMI 	<ul style="list-style-type: none"> ● Households currently at or below 50% AMI AND
	<ul style="list-style-type: none"> ● Have additional risk factors: <ul style="list-style-type: none"> ○ Formerly homeless individuals, ○ Older adults, ○ People with disabilities, ○ Families with minor children that are not yet school-age ○ Families where the head of household is young, ○ Undocumented individuals ○ Fixed Income ○ Fleeing domestic violence 	

SGV Home Portal

The Transitional Guidelines require that data be collected related to the risk of homelessness and reductions in homelessness, displacement, displacement risk, rents, and evictions in the region. To collect this data, the Program uses a centralized online portal administered by SGVCOG to ensure consistent, accurate, and secure data management across all service providers.

The SGV HOME Online Portal (“Portal”) serves as the single entry point for all program referrals and program enrollments, provides a mechanism for tracking duplicative enrollments across multiple Providers, tracks expenditures and ensures provided to each client, and program exits. By consolidating these elements within one system, the SGVCOG ensures that data is collected and tracked consistently, improving the accessibility and quality of reporting.

The Portal is secured for all data and privacy requirements and is accessible only using unique login credentials. Each provider must designate specific staff members to use the Portal, based on their role within the Program. Each designated staff person must be trained in the Program Guidelines and the use of the Portal. Once the designated staff person has been trained, he/she will be assigned unique login credentials based on their role within the Program.

Approved users must enter all Program information into the Portal, using the designated forms, such as the following:

- *Referral Forms*: Used for Client Referrals
 - *Public Referral Form*
 - *City/Service Provider Referral Form*
- *Client Application Form*: Used to Enroll Clients
- *Client Services Form*: Used to document services provided to clients while they are enrolled in the Program
- *Financial Assistance Form*: Used to document financial assistance provided to a client
- *Monthly Assistance Exceedance Approval Form*: Used to request additional monthly funds for enrolled clients.
- *Financial Assistance Exception Form*: Used to request an alternative Financial Assistance type
- *Exit Form*: Used to exit a client from the Program

Providers are responsible for ensuring that all required information is entered into the Portal.

There will be a separate user guide for the Providers for the Portal.

Program Referrals and Enrollment

Referral Submission

All referrals shall be received through the Portal. There are 2 referral forms available:

1. *Public Referral Form*: Any household that is at-risk of falling into homelessness may submit this referral form. The referral form will collect basic client information, including current address and zip code, as well as a high-level description of the current housing situation, including any potential legal concerns.
2. *Public Agency/ Service Provider Referral Form*: Cities and/or service providers that are working with a household that is at-risk of falling into homelessness may submit this referral form. The referral form will request public agency contact information for the referring party, household information (e.g. size of household, household’s AMI, household’s current city of residence, etc.), verification of high-level eligibility, and a high-level description of the current housing situation. The referring party will also be asked to

provide information about any immediate legal concerns (e.g. three day notice). While referring parties are not required to submit any documentation on behalf of clients, they are encouraged to work closely with clients prior to submitting a referral to ensure that the client meets all LACAHSAs eligibility criteria. Cities and Service Providers are also encouraged to complete the referral as accurately and completely as possible, to ease the enrollment process for the client.

Cities are encouraged to use the online form for referrals. However, cities may directly contact their assigned service provider (via phone or email) to submit a referral. If a service provider receives a referral from a city that is not submitted through the form, the service provider is responsible for completing the referral form on behalf of the referring party.

SGV Home will also accept referrals received via phone or email. In these instances, the recipient of the phone call or email will be responsible for submitting the referral through the online portal.

All clients must be referred through the online platform. No client can be enrolled in the Program without having a completed referral form.

All referrals submitted into the online platform will be reviewed using the same process, regardless of referral source (e.g. public; public agency/service provider). Referrals will be accepted on an ongoing basis.

Referral Review

Each Service Provider must assign designated staff that is responsible for reviewing and submitting referrals in the SGV Home Portal. These individuals must be trained in the referral and enrollment processes. Log-in credentials to the SGV Home portal will only be provided once the training has been completed. Should a designated staff person leave during Program implementation, the Service Provider is responsible for informing the SGVCOG and assigning another staff person to be trained in the Portal.

Each system user must have their own unique log-in credentials. Service Providers should not share log-in credentials. If the SGVCOG determines that log-in credentials are being shared, the SGVCOG reserves the right to revoke system access privileges.

Once a referral is submitted through the online portal, an email will automatically be sent to appropriate Provider staff (Service Provider and Legal Services Provider) and the assigned SGVCOG staff. There are 3 pathways that the referral can then take:

1. *Household is not eligible for SGV Home:*

If a household appears to be ineligible for SGV Home based on the referral, the SGVCOG staff person will contact that household and inform them that they are not eligible. If the referral was received from a city or public agency or service provider, SGVCOG staff will also contact the referring entity. Staff will inform the household of any alternative resources for which the household may be eligible. For example, if a household is ineligible due to their current residency location, it will be connected or referred to appropriate programs (e.g. LACAHSAs; other eligible jurisdictions) that serve their location.

2. *Household is eligible for SGV Home and has no immediate legal need:*

If a household appears to be eligible for SGV Home based on the referral and has no immediate legal need, the designated staff from the Service Provider shall continue the enrollment process, as outlined in the [Enrollment](#) section.

If there are no Financial Assistance slots available with the designated Service Provider, the client shall either be directed to another Service Provider or assigned to the wait list. If the client is added to the wait list, SGVCOG staff is responsible for communicating that to the client.

3. *Household is eligible for SGV Home and has an immediate legal need:*

If a household appears to be eligible for SGV Home based on the referral and has an immediate legal need, the referral will go directly to the Legal Services Provider to continue the [Enrollment](#) process.

Enrollment

Households/individuals are enrolled in SGV Home using the “Client Application Form” in the Online Portal. The Client Application Form will collect client contact information, eligibility information and documentation, and prioritization information and documentation. All required verification documents will also be collected and uploaded via the Client Application Form.

Providers are responsible for working with the households/individuals to complete the enrollment process. **There must be a designated individual or individuals from each Provider that is responsible for completing this enrollment process. This individual(s) must be trained on the SGV Home Program, the enrollment process and requirements, and the SGV Home portal.**

Service Providers are responsible for completing the enrollment process for Financial Assistance Slots. Legal Providers are responsible for completing the enrollment process for clients who were directly referred for Legal Services.

The designated staff for the assigned Provider is responsible for continuing the enrollment process, including verifying eligibility and enrolling eligible clients. Prior to outreaching to the household, the designated staff should complete the following initial duplication of benefits check:

1. *SGV Home:* Confirm that the household/individual is not currently enrolled in SGV Home, including with another Provider. If they were previously enrolled in SGV Home, confirm that the household/individual is still eligible for SGV Home resources.
2. *Homeless Management Information System (HMIS):* Confirm that the household/individual is not enrolled in another program-solving program with LACAHA or with the Los Angeles Homeless Services Authority (LAHSA) and is not currently receiving homeless services resources designed for clients who are unhoused.

If the household/individual **is** enrolled in SGV Home or another program in HMIS, the designated staff should reach out to the individual/household to verify their enrollment and to communicate that they are not eligible for SGV Home. The designated individual should inform the

household/individual of other potential resources. This should be done as quickly as possible, with a target of 1 to 2 business days.

If the designated staff determines that the household/individual is not enrolled in another program, the Provider shall then continue the enrollment process by completing the “Client Application Form” within the online portal. **The designated staff should initiate enrollment for eligible households/individuals as quickly as possible, with a target of 1-2 business days.** SGVCOG staff shall monitor timelines to ensure that clients are being contacted in a timely manner.

If a client meets the eligibility criteria and is not enrolled in another similar program, the service provider must proceed with the enrollment process. The service provider may not use other criteria to determine not to move forward with the Client Application.

Client Application Form

The Client Application Form is how clients are enrolled in the Program and how clients are prioritized. All required client documentation is also collected as part of the Client Application process.

The Provider is responsible for completing the Client Application Form. The Client Application Form can be found in the Online Portal. The Provider shall work with the client to collect all necessary information and documents. As noted above, the Service Provider must begin completing the client application form for eligible clients as quickly as possible, with a target of 1-2 business days.

The Client Application Form does not have to be completed in one sitting. A Provider may return to complete portions of the application and upload documents as the information becomes available.

The Provider should work with the client to complete the application as quickly as possible. This includes collecting all documentation from the client. The service provider should ensure that the client is proactively working to collect all of the necessary enrollment documents.

If a client is not responsive to requests for information or documents for 2 weeks, the service provider shall exit the client from the program. The Provider shall inform the client that they will need to resubmit a new referral in order to be enrolled in SGV Home.

Attachment D provides an overview of the information, documentation, and actions that are will be collected using the Client Application Form:

The designated staff member from the Service Provider is responsible for attesting that the information submitted on behalf of the client is true to the best of their knowledge.

Once an application is submitted for an eligible client, the individual will be assigned a client identification number. The client will be assigned a number and will be assigned to a Provider. The Provider is then responsible for providing all of the required services to the client.

Clients may be enrolled in “Financial Assistance” or “Legal Services,” on, in some cases both. Each client that is enrolled in “Financial Assistance” will fill a “Financial Assistance Slot.” When all Financial Assistance Slots are full, the client will be assigned to the wait list. The SGVCOG will manage slot availability. If the client is enrolled in both Financial Assistance and Legal Services, the Service Provider will serve as the lead in [client services](#); however, they will coordinate closely with the Legal Services Provider for the provision of all services.

Each client that is enrolled only in Legal Services will be enrolled with the Legal Services Provider. The Legal Services Provider is responsible for tracking enrollment in that program component.

Client Services

Financial Assistance Slots

Once a client has been enrolled in a Financial Assistance Slot, the Service Provider shall assign one of the Program case managers to that client to provide the required client services, as described in this section. The assigned case manager should provide services to that client for the duration of the client’s enrollment in the Program.

Case Management

The goal of case management is to understand the needs of the client, provide tools and support to help ensure that the client can remain stably housed after their participation in the Program ends, and provide ongoing support for the client throughout their enrollment.

Upon Program enrollment, the case manager is responsible for the following:

1. *Initial Case Management Meeting*: This meeting will be used to establish rapport between the client and the case manager and will begin to assess client needs. During this meeting, all participants will undergo an initial assessment, set goals, evaluate ongoing support, and establish problem-solving interventions.

This meeting should be held as quickly as practicable as possible after the client is enrolled to ensure that the client can receive the resources that they need. **It must be held within 5 business days of enrollment.** The meeting should be held at a time and location that is convenient for the client. Unless pre-approved by the SGVCOG, this meeting must be held in-person. Unless pre-approved by the SGVCOG, the case manager must also hold this meeting prior to authorizing the payment of any financial assistance.

If the client is not working with the Service Provider to schedule the Initial Meeting (e.g. is non-responsive to meeting set-up requests), the client will be exited from the Financial Assistance Slot.

2. *Problem Solving Conversations*: In coordination with the Initial Meeting and the Housing Stability Plan, the case manager is responsible for working with the client to determine the appropriate level of financial assistance for the client based on their individual needs. The intent of these conversations is to identify the appropriate financial intervention to help the

client maintain their housing on an ongoing basis. The goal of these conversations is to identify the minimum amount of financial assistance required to ensure that the person does not lose their housing and will be able to maintain their housing after their exit from the Program.

Problem solving conversations may be integrated into existing meetings (including the Initial Meeting and Ongoing Case Management meetings); however, the problem-solving conversations should be ongoing and the problem-solving approach should be integrated into all of the case manager's work with their clients.

3. *Housing Stability Plan*: A case manager must develop a housing stability plan – in a format approved by the SGVCOG – to assist participants in sustaining their current housing. This Plan will help to establish an action plan to ensure the longer-term housing stability of that participant, even after Financial Assistance has been provided and has ended. The development of the Housing Stability Plan should include a discussion on the client's financial situation, budgeting, and, as necessary, approaches to increase the client's income. The case manager should also evaluate that clients are accessing all mainstream resources and services for which they are eligible, and, as necessary, supporting enrollment in those other programs.

The case manager will continue to update their clients' Housing Stability Plan throughout the duration of the client's enrollment, to track whether housing and other service goals are being met while financial assistance is provided. It is imperative that assigned case managers working with each participant communicate and establish meeting expectations to manage participant outcomes.

A template for the Housing Stability Plan will be provided by the SGVCOG.

4. *Ongoing Case Management Meetings*: A case manager must meet with each client on a bi-weekly basis. The purpose of these meetings is to maintain participant engagement, provide ongoing support to participants, assess progress on the client's Housing Stability Plan and goals, review and revise their Housing Stability Plan as necessary, and provide other necessary resources and services to ensure the client's ongoing success.

In addition, Case Managers may access and utilize effective tools that support a participant's housing goals and long-term stability, including, but not limited to

- Goal-setting templates
- Financial planning or budgeting tools
- Problem-solving and conflict-resolution frameworks
- Referral networks

The first ongoing case management meeting should be held approximately 2 weeks after the Initial Meeting, and approximately every 2 weeks thereafter. At least one meeting a month must be held in-person, unless pre-approved by the SGVCOG, and the other meeting in the month may take place virtually or over the phone.

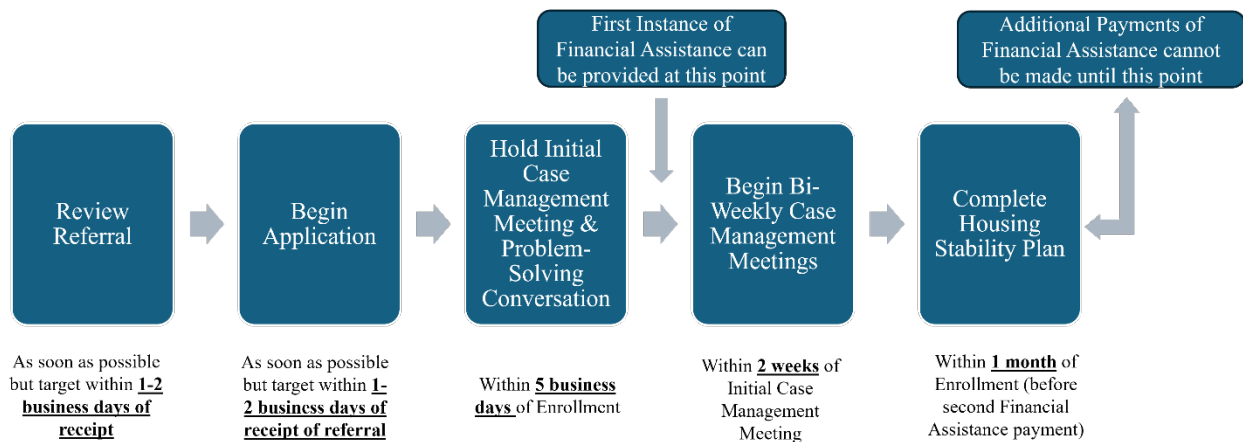
5. *Ongoing Communication*: Case Managers shall be responsible for maintaining reasonable and ongoing availability to participants throughout their enrollment period. Response time shall be within **1 to 2 business days**.

The case manager must complete the Initial Meeting and initial problem-solving conversation prior to providing any financial assistance. The case manager must also ensure that completing these steps does not prevent the client from receiving the financial assistance necessary to ensure that they do not lose their housing. As such, the case manager must complete this process as quickly as practicable.

The Housing Stability Plan and ongoing case management meetings must be completed within the first month of enrollment. While the first instance of financial assistance may be paid upon completion of the Initial Meeting and the initial problem-solving conversations, additional financial assistance may not be paid until the Housing Stability Plan and ongoing case management meetings are completed.

Figure 1 (below) outlines the timeline for providing case management services for eligible clients.

Figure 1. Enrollment Timeline for Eligible Clients



Services Documentation

The case manager shall document the provision of all services to their clients within the SGV Home Online Portal. The case manager must document each instance of the provision of services to the client using the appropriate form within the SGV Home Portal. This will document the date of services, type of services, and any documentation of those services.

Prior to approving a Service Provider’s monthly invoice, SGVCOG staff will verify that the appropriate services have been provided and documented through the SGV Home Online Portal. If the appropriate services have not been provided, the SGVCOG reserves the right to withhold reimbursement for those services.

Providing Financial Assistance

The case manager shall use the initial case management interactions (Initial Case Management Meeting, including problem solving conversation) to begin determining the client’s financial assistance needs. The case manager should be working to identify the minimum amount of financial assistance required to ensure that the person does not lose their housing and will be able to maintain their housing after their exit from the Program. Based on these case management interactions, the case manager must evaluate the following 2 questions:

- 1) What is the appropriate type of Financial Assistance for the client?
- 2) What is the appropriate amount of Financial Assistance for the client?

Determining the Appropriate Type of Financial Assistance

As described in the [Program Components](#) section, there are 3 types of Financial Assistance:

Table 3. Financial Assistance Types.

<i>Program</i>	<i>Eligible Expenditures</i>	<i>Additional Eligibility Requirements</i>	<i>Funding Limitations</i>
Emergency Rental and Flexible Financial Assistance (“ERFFA”)	Housing-related costs, including rental assistance and arrears, utilities, move-in and relocation expenses, essential household needs, and other housing stability expenses such as transportation, healthcare, food, and short-term vocational training.	Household cannot be living in subsidized housing (e.g. time-limited subsidies (TLS), rapid re-housing, other Temporary Rental Assistance Programs)	Rental Assistance may not exceed 6 months, authorized 1 month at a time (excluding rental arrears)
Temporary Rental Assistance (“TRA”)	Covers rental and utility assistance; may be used as step-down support for households exiting time-limited or permanent subsidy programs	Household may be living in subsidized housing (e.g. TLS; rapid re-housing; other Temporary Rental Assistance Program)	Up to 6 months of assistance, authorized 1 month at a time
Short-Term Income Support (“STIS”)	Direct payments to eligible households to help meet basic needs during temporary financial instability	Must have a documented housing crisis that cannot be resolved without short-term income support	Up to 18 months of assistance, authorized 1 month at a time Assistance may not exceed \$2,000 per month

For SGV Home, EFFRA is the primary Financial Assistance category through which case managers should provide financial assistance. All clients that are eligible for EFFRA should receive Financial Assistance of that type. If a client is

- 1) In need of rental assistance or other assistance to be paid to a third-party AND**
- 2) Is living in unsubsidized housing, they are eligible for EFFRA and should be provided with EFFRA.**

If the client is in need of rental assistance or other assistance to be paid to a third-party but is living in subsidized housing, they are only eligible for ERA. If a client is not in need of rental assistance or other assistance to be paid to a third party but is instead in need of financial assistance to be paid directly to them, as a bridge to increased income, they are only eligible for STIS.

If the case manager determines that either TRA or STIS is required, the case manager must complete the “Financial Assistance Exception Form” within the SGV Home Portal. On the “Financial Assistance Exception Form,” the case manager must document why the client should not be provided with ERFFA but instead should be provided TRA or STIS.

Determining the Appropriate Amount of Financial Assistance

The amount of Financial Assistance provided to a client should be the minimum amount required to ensure that the person does not lose their housing. The client should be able to maintain their housing after their exit from the Program. The amount of Financial Assistance must be equal to the documented expenditure cost and must take into consideration the client’s or household’s ongoing financial situation to ensure sustainability and appropriate use of funds.

Service Providers may authorize monthly assistance to a client, with a target to provide no more than three (3) months of Financial Assistance. Case Managers may not provide Financial Assistance that exceeds six (6) months in duration.

In determining the amount of Financial Assistance, case managers must adhere to the following funding guidelines and limits. Please note that all Financial Assistance - regardless of which Provider authorizes it - applies to this cap. For example, if a client is receiving both Financial Assistance and has a financial assistance need related to their Legal Services, both expenditures will count towards the client’s overall cap.

Table 4. Financial Assistance Limits – Service Providers.

Household Type	Allowed without Pre-approval from SGVCOG	Allowed <u>only with Pre-approval</u> from the SGVCOG	Not Allowed
One-Person	ERFFA up to \$1,750 per month for up to 6 months, provided that total payments to client do not exceed \$5,000	<ul style="list-style-type: none"> • Monthly requests that exceeds \$1,750 per month • Overall payments to client exceed \$5,000 • ERA or STIS requests 	<ul style="list-style-type: none"> • Expenditures greater than \$18,000 in a 6-month period • Expenditures greater than \$36,000 in a
	NOTE: If a client is also receiving money for a legal settlement, the amount of the legal settlement is also included in the \$5,000 overall cap.		

Two-Person or More	ERFFA up to \$3,500 per month for up to 6 months, provided that total payments to client do not exceed \$10,000	<ul style="list-style-type: none"> • Monthly requests that exceeds \$3,500 per month • Overall payments to household exceed \$10,000 • ERA or STIS requests 	24-month period
NOTE: If a client is also receiving money for a legal settlement, the amount of the legal settlement is also included in the \$10,000 overall cap.			

If Financial Assistance is only allowed with pre-approval from the SGVCOG, the case manager must use the appropriate process within the SGV Home Portal to request pre-approval. The Online Portal system will also provide notifications as the client makes progress towards their overall funding limits.

Authorizing Financial Assistance

Once a case manager has determined the appropriate amount of Financial Assistance, he/she must use the appropriate form or forms within the SGV Home Portal to document the amount and type of Financial Assistance. If the amount and type of assistance requested by the Service Provider does not have to be pre-approved by the SGVCOG, the case manager may submit the “Financial Assistance Form” in the Portal. This Form must be submitted within the Portal each time that the case manager recommends Financial Assistance for a client. **Ongoing Financial Assistance (e.g. monthly rental assistance) can only be approved one month at a time.** Each month, the case manager must verify that the client still meets the eligibility criteria and still lives in the designated unit. It is the responsibility of the case manager to ensure that the client remains eligible for the Program.

Financial Assistance Exceedances and Exceptions

Financial Assistance requests that require pre-approval (e.g. exceed the established pre-approved monthly limits or overall limits; are for ERA or STIS) must be approved by the SGVCOG prior to expenditure. If the case manager is requesting a Financial Assistance exceedance, he/she must complete and submit a “Financial Assistance Exceedance Form” in the Portal. If the case manager is recommending use of ERA or STIS, he/she must complete and submit the “Financial Assistance Exception Form” in the Portal. Financial Assistance exceedances and exceptions will be reviewed by SGVCOG staff within 2 business days of submission. **The “Financial Exceedance Form” and/or “Financial Assistance Exception Form” must be completed before a payment that requires pre-approval can be made.** Table 4 (above) indicates the Financial Assistance limits.

If SGVCOG staff approves the exceedance and/or exception, the case manager must then complete and submit the “Financial Assistance Form” in the Portal at the time of payment. SGVCOG staff will verify submission of this form as part of the invoicing review process. The case manager must submit a “Financial Assistance Exceedance Form” for each month in which the recommended Financial Assistance exceeds the pre-approved amounts. The case manager must submit a “Financial Assistance Exception Form” for each month/instance in which he/she recommends using the ERA or STIS Financial Assistance categories. Table 5 (below) provides an overview on which forms are used in which circumstances.

Table 5. Pre-Approval Forms – Service Providers.

Situation	Portal Form Required
If Expenditure is Allowed without Pre-approval	“Financial Assistance Form”
If Expenditure is Only Allowed with Pre-approval	
EFRA Expenditure Exceeds Financial Limits	“Financial Assistance Exceedance Form”. If approved, “Financial Assistance Form”
Expenditure is for ERA or STIS	“Financial Assistance Exception Form” If approved, “Financial Assistance Form”
Expenditure Exceeds Financial Limits AND is for ERA or STIS	“Financial Assistance Exceedance Form” AND “Financial Assistance Exception Form”. If approved, “Financial Assistance Form”

It is important to note that Financial Assistance may only be provided to enrolled clients and eligible clients. This means that all required client eligibility documentation must be collected and uploaded into the designated system prior to disbursement. No payment may be issued until documentation requirements have been satisfied. If the SGVCOG determines that Financial Assistance payments have been made to clients that are not enrolled and/or are not eligible, the Service Provider will not be reimbursed for that payment.

For each month for which the client receives Financial Assistance, they will remain enrolled in the Program and will continue to receive Case Management, consistent with the requirements described in the [Case Management](#) section above.

Rental Arrears

Rental arrears are an eligible expenditure under ERFFA. If the amount of rental arrears exceeds the pre-approved amount, the case manager must submit the “Financial Assistance Exceedance Form.” Generally speaking, when requesting rental arrears, the case manager should generally use the monthly pre-approval limits as a baseline for the amount of rental arrears to recommend. For example, the case manager should generally not recommend rental arrears more than \$1,750 per month for a one-person household or more than \$3,500 per month for a two or more-person household.

For rental arrears, even if the client receives a one-time payment, the client will still be enrolled in the Program and receive Case Management for the number of equivalent months for which they received Financial Assistance. For example, if a one-person household received rental arrears equal to \$5250 (\$1750 x 3 months), it should be enrolled in the Program for 3 months. If the Service Provider determines that the client has received adequate case management before the end of this period, the Service Provider may request that approval from the SGVCOG to exit the client early.

Information on Tax Implications

Service Providers must inform the client of the tax implications associated with the receipt of financial assistance.

Payment Issuance

The Service Providers are responsible for verifying the validity of and identity of each payee prior to the disbursement of SGV Home funds. The payee must be eligible, and the Service Provider must collect and maintain the appropriate supportive documentation to validate the payee's eligibility to receive payment on the specific type of financial activity being provided to a household.

For all EFRRA and TRA, payments must be issued directly to the landlord, property management company, or other approved third party. Payments for STIS may be issued directly to the household. Service Providers must make sure that the payee information is accurate, verified, consistent with supporting documentation prior to issuing payment.

Service Providers must maintain fraud detection procedures as part of the implementation of the Program. More information on fraud detection requirements can be found in that [section](#) of the Guidelines.

Referrals to Legal Services

For all clients that have been enrolled in Financial Assistance and Legal Services simultaneously, the Service Provider is responsible for coordinating with the Legal Services Provider to ensure that the appropriate legal services are provided to the client. The Service Provider should ensure that all instances of Legal Services are documented in the Portal on behalf of the client.

If a Service Provider determines after Program enrollment that a client enrolled in a Financial Assistance Slot is also in need of Legal Services, they may reach-out directly to the Legal Services Provider to request support. The Service Provider must include the SGVCOG staff in this request and document the request in the Portal using the "Services" Form.

Legal Services

When a client has been enrolled only in Legal Services, the Legal Services Provider is responsible for working with that client to determine the type of legal services required and to then undertake those interventions. A client that is only enrolled in Legal Services will not receive case management services from a Service Provider. The Legal Services Provider is responsible for ensuring that the client is receiving the necessary resources to ensure that the client retains housing.

The Legal Services Provider and the client are responsible for working together to determine the appropriate legal course of action based on the client's needs. However, the SGVCOG reserves the right to set a limit on the financial value of Legal Services that an individual client may receive.

The Legal Services Provider is responsible for tracking its program component enrollments and reporting to the SGVCOG, consistent with the requirements of the "Reporting" section of these Guidelines. If the Legal Services Provider determines that it does not have sufficient capacity to enroll additional Legal Services clients, it must notify the SGVCOG immediately. The Legal Services Provider may not reject clients for Legal Services without written pre-approval from the SGVCOG.

Services Documentation

The Legal Services Provider must document the provision of all services to their clients within the SGV Home Online Portal, within the limits of attorney-client privilege. The Legal Services Provider should document the type of Legal Services being provided to each client using the appropriate form within the SGV Home Portal, including any necessary back-up.

Authorizing Financial Assistance

Some clients enrolled in Legal Services may require financial assistance to resolve their legal situation. If this is the case, the Legal Services Provider may authorize the use of Financial Assistance. Financial Assistance provided by the Legal Services Provider must be extremely limited and have a specific purpose related to the client’s settlement and eviction resolution. **It is expected that a Legal Services Provider will only provide one or two payments on behalf of clients.** This could include costs associated with resolving a client’s legal matters and/or, in limited circumstances, financial assistance for move-in costs for a new unit. **The Legal Services Provider may not authorize ongoing rental assistance or other ongoing expenditures for a Legal Services client.**

In determining legal-related financial assistance, the Legal Services Provider must adhere to the following funding guidelines and limits. **Please note that all Financial Assistance - regardless of which Provider authorizes it - applies to this cap. For example, if a client is receiving both Financial Assistance and has a financial assistance need related to their Legal Services, both expenditures will count towards the client’s overall cap.**

Table 6. Financial Assistance Limits – Legal Services Provider.

Household Type	Allowed without Pre-approval from SGVCOG	Allowed <u>only with Pre-approval</u> from the SGVCOG	Not Allowed
One-Person	Up to \$3,000, provided that total payments to client do not exceed \$5,000.	<ul style="list-style-type: none"> • One-time requests of more than \$3,000 • Overall payments to client that exceed \$5,000 	<ul style="list-style-type: none"> • Expenditures greater than \$18,000 in a 6-month period • Expenditures greater than \$36,000 in a 24-month period
	NOTE: If a client is also receiving Financial Assistance, the amount of Financial Assistance is also included in the \$5,000 overall cap.		
Two-Person or More	Up to \$5,000, provided that total payments to client do not exceed \$10,000.	<ul style="list-style-type: none"> • One-time requests of more than \$5,000 • Overall payments to household exceed \$10,000 	
	NOTE: If a client is also receiving Financial Assistance, the amount of Financial Assistance is also included in the \$10,000 overall cap.		

If a client is enrolled in both Legal Services and Financial Assistance, the Legal Services Provider may still request financial assistance funds to resolve a client’s legal needs. However, it is expected that this will happen on an extremely limited basis. For budgeting and program planning purposes, it is expected that clients receiving financial assistance to resolve a legal issue will not also receive concurrent ongoing financial assistance.

If the amount of assistance requested by the Legal Services Provider does not have to be pre-approved by the SGVCOG, the Legal Services Provider may submit the “Financial Assistance Form” in the Portal. This Form must be submitted within the Portal each time that the Legal Services Provider requests legal-related financial assistance for a client. However, as noted above, it is anticipated that this will include only one or two payments on behalf of clients. Each time that financial assistance is requested, the Legal Services Provider must verify that the client still meets the eligibility criteria and, as necessary, still lives in the designated unit. It is the responsibility of the case manager to ensure that the client remains eligible for the Program.

As noted above, these financial assistance requests must be limited to the costs associated with resolving legal issues, so there should only be one (1) or two (2) submissions for each client. **If the Legal Services Provider submits financial assistance requests for ongoing payments, the SGVCOG reserves the right to withhold reimbursement to the Legal Services Provider.**

Financial Assistance Exceedances

Requests that require pre-approval (e.g. exceed the established pre-approved limits or overall limits) must be approved by the SGVCOG prior to expenditure. The Legal Services Provider must complete and submit a “Financial Assistance Exceedance Form” in the Portal. The exceedance requests will be reviewed by SGVCOG staff within 2 business days of submission. **The “Financial Exceedance Form” and/or “Financial Assistance Exception Form” must be completed before a payment that requires pre-approval can be made.** Table 6 (above) indicates the Financial Assistance limits for Legal Services Providers.

If SGVCOG staff approves the exceedance, the Legal Services Provider must then complete and submit the “Financial Assistance Form” in the Portal at the time of payment. SGVCOG staff will verify submission of this form as part of the invoicing review process. The case manager must submit a “Financial Assistance Exceedance Form” for each instance in which the request exceeds the pre-approved amounts. Table 7 (below) provides an overview on which forms are used in which circumstances.

Table 7. Pre-Approval Forms – Legal Service Providers.

Situation	Portal Form Required
If Expenditure is Allowed without Pre-approval	“Financial Assistance Form”
If Expenditure is Only Allowed with Pre-approval	
Expenditure Exceeds Financial Limits	“Financial Assistance Exceedance Form”. If approved, “Financial Assistance Form”

Referrals to Financial Assistance

While providing Legal Services, a Legal Services Provider may determine that a client requires ongoing financial assistance (e.g. rental assistance). **A client receiving can only be referred from Legal Services to Financial Assistance using the referral process and the Financial Assistance Slot enrollment process.**

Exiting Clients

Providers must complete a “Close-Out Form” in the Portal to formally document all program exits. The Close-Out Form serves as the official record of a household’s exit, documenting the date of exit and the reason for exit for each client. Submission of the “Close-Out Form” is how Financial Assistance Slots are re-opened.

A client must be exited for the following reasons:

- Change in Program eligibility;
- Maximum benefits reached;
- Self-resolution;
- Voluntary Withdrawal;
- Relocation;
- Completion of Program Goals.

There are limited resources available, so it is critical that there is active work occurring to resolve the client’s housing crisis. There may be many factors that limit clients’ ability to participate in the Program (e.g. lack of mobility; language barriers; schedule; history), and the Provider must work to resolve these issues to the greatest extent possible.

However, if a Provider is working to meet clients’ barriers and a client is not actively participating in the Program, a client may be exited from the Program.

If a client meets one or more of the following criteria, the Provider must inform the SGVCOG, for consideration of Program exit:

- Lack of contact for more than 2 weeks;
- Consistent missed case management meetings;
- Significant delays in collecting necessary documents and information (with a lack of perceived effort to collect them).

These criteria must be clearly communicated to the client upon enrollment.

No client may be exited from the Program for lack of participation without the prior approval of the SGVCOG.

Fund Disbursement

This section establishes the requirements for Providers to disburse Financial Assistance on behalf of eligible clients. It is intended to ensure that each client receiving financial assistance meets established eligibility criteria for specific program activities and that RPHP funds are being used in compliance with LACAHSAs requirements.

Disbursing Financial Assistance Funds

Each Provider is responsible for disbursing Financial Assistance to payees on behalf of their eligible clients. Prior to disbursing Financial Assistance to a client or on behalf of a client, the Provider must ensure the following:

1. Client is actively enrolled in the Program and has an assigned client ID.
2. All client enrollment documents have been collected and uploaded into the Portal.
3. The client's address of residence exists.
4. [For monthly rental assistance: Client continues to meet eligibility requirements].
5. The "Financial Assistance Request Form," with proper documentation, has been completed within the Portal.
6. [If request is not for ERFFA: The "Financial Assistance Exception Form," with proper documentation, has been completed and submitted within the Portal.]
7. [If exceeds pre-approved limit: The "Financial Assistance Exceedance Form," with proper documentation, has been completed and submitted within the Portal.]

As noted previously, a Provider may authorize Financial Assistance one month at a time, and the Provider must verify that the client remains eligible each month.

As part of the monthly invoicing process, SGVCOG staff will verify that these steps have been completed for each client.

Additional requirements may be established at a later point.

Each Provider is also responsible for verifying the legitimacy of each payee. The following types of information must be collected prior to disbursing payment to a payee:

- Documentation that the payee has the legal right to collect funding from the client (e.g. proof of ownership; proof of lease if client is subleasee, etc.);
- Completed W-9;
- [If rental assistance/rental arrears/other housing-related cost: Documentation that the client is a tenant]
- [If rental arrears: Documentation of the amount of rental arrears owed]
- Signed participation agreement.

Additional requirements may be established at a later point.

If the Provider is unable to collect the necessary information from the payee, they should consult the Legal Services Provider to determine the appropriate course of action.

Fraud Detection

It is the responsibility of each Provider to ensure that adequate controls are in place to deter, prevent, and detect fraud. Each Provider must have its own adopted internal controls, policies, and procedures in place to deter, prevent, and detect fraud that are provided to the SGVCOG for approval prior to Program launch. Examples of procedures to detect fraud include but are not limited to the following: landlord verification (e.g. identified individual/company is legitimate and owns the property; of multiple levels of review; positive pay; phone verification of wire change

instructions; and dual signatures on checks. Providers should not publicly share their fraud procedures, in order to prevent the information from being used to circumvent the fraud measures.

Invoicing

To facilitate invoicing, the SGVCOG shall establish an invoicing folder in SharePoint for each Provider for the submission of monthly invoices. Within the Provider folder, a folder will be set-up for each month. There are two types of invoicing processes for the Program: one for Financial Assistance and one for ADCs and Program Administration. These are described in more detail below.

Reconciliation

For Financial Assistance, the SGVCOG will provide the option for Providers to receive an upfront disbursement of funding for Financial Assistance. **These upfront disbursements can only be used for Financial Assistance and not for ADCs or Program Administration.**

In order to be eligible to receive funds up-front, a Provider must meet the following criteria:

- Provider must have SGVCOG-approved fraud detection policies, procedures, and controls;
- Provider must establish a separate bank account into which up-front funds can be held.

The advance amount will be calculated as the number of approved client slots multiplied by \$1,750 per month (e.g., 20 client slots × \$1,750 = \$35,000). This advance amount would be replenished based on the reconciliation process described in the next section.

Documentation Process

Within the Sharepoint Invoicing folder, the Provider shall create a separate folder for each client, named based on the Client ID, and upload all required documentation into the correct folder.

Required documentation includes the following:

- PDF of each financial assistance payment made during the month;
- Proof of payment (e.g., cleared check or payment confirmation);
- Copy of the associated bill, lease, or other supporting documentation. If a lease or rental agreement was previously submitted with the approved client application, it need not be resubmitted.

This process shall be completed on a monthly basis, no later than the 5th day of the following month. Provider shall upload all materials into the SharePoint Invoicing Folder.

Beginning on the 6th day of each month, SGVCOG staff will review submitted materials to verify the following information:

- Client enrollment and approved application status;
- Accuracy of payment documentation;
- Submission of each Financial Assistance Forms;
- Submission and approval of any required Exceedance Forms
- Proper file organization;

- Inclusion of all required supporting documentation and proof of payment.

The SGVCOG will maintain an “Issues Log” to document discrepancies and communicate required revisions to the Service Provider.

After verifying that all documentation is in order, SGVCOG staff will calculate how much was spent during the previous month. SGVCOG staff will complete an internal form to document the value of verified expenditures made by the Provider in the previous month.

After receiving this internal form, SGVCOG Accounting staff will then issue an additional payment in the separate bank account for the Provider, equal to the value of verified expenditures for that month.

The SGVCOG reserves the right to suspend or cancel the right to receive up-front disbursements for Financial Assistance if a Provider is not properly complying with the reconciliation requirements.

Reimbursement Process

By the 10th day of each month, Provider shall upload an invoice - using the SGVCOG’s invoice template - that includes all expenses of the previous month - to the Sharepoint Invoicing folder. As part of each invoice, Provider must also provide documentation of how clients were served during the previous month. A template will be provided by the SGVCOG.

If the Provider is being reimbursed for Financial Assistance, it must prepare the Financial Assistance documentation outlined in the [Documentation Process](#) section.

Activity Delivery Costs (ADCs) and Program Administration Costs

Staffing (rates and FTEs) for ADCs and Program Administration Costs shall be established in each Provider agreement with the SGVCOG. Provider shall submit monthly invoices for staffing and other direct costs based on the agreement budget.

Invoicing shall be completed on a monthly basis for ADCs and Program Administration based on the staff working on and the direct charges to the SGV Home Program in the previous month, and consistent with the Provider agreement. All invoicing for ADCs and Program Administration Costs will be done on a time-and-materials, with appropriate back-up required. **As established in the Transitional Guidelines, indirect costs as allocated by an indirect cost rate are not allowed. All such costs should be included in either ADCs or Program Administration Costs.**

The following back-up must be provided for ADCs and Program Administration staffing:

- **Full-Time Dedicated Staff (100%):** Provider shall submit a duty statement, job description, or offer letter for any employee whose time is 100% dedicated to this project for the first invoice of this MOA. The following is required for every monthly invoice:
 - Payroll documentation showing cost for that period
 - System-controlled and system-locked timesheets that support audit compliance and accurate billing documentation. Timesheets must include all time worked on the Program, all time worked in the pay period, and signed by employee and supervisor.

- If timesheets are submitted electronically in a timekeeping system, the timesheet must be permanently locked and unalterable after employee submittal and supervisor approval. Any adjustments to the timesheet shall require a separate correction entry that maintains a complete audit trail, including the identity of the individual making the correction, the date and time, and the reason for the change.
 - If timesheets are not submitted electronically in a timekeeping system, the timesheet must be printed and a hard copy must be signed and submitted. Any adjustments to the timesheet must be signed and initialed by both the employee and the supervisor, with an explanation for the reason of the change.
- **Part-Time/Non-Dedicated Staff:** Provider must the following for every monthly invoice:
 - Payroll documentation showing cost for that period
 - System-controlled and system-locked timesheets that support audit compliance and accurate billing documentation.
 - Timesheets must include the following information.
 - Date of work
 - Name
 - Position
 - Hourly Rate (as outlined in agreement)
 - Hours spent on Program
 - Description of activity that captures the Program work
 - If timesheets are submitted electronically in a timekeeping system, the timesheet must be permanently locked and unalterable after employee submittal and supervisor approval. Any adjustments to the timesheet shall require a separate correction entry that maintains a complete audit trail, including the identity of the individual making the correction, the date and time, and the reason for the change.
 - If timesheets are not submitted electronically in a timekeeping system, the timesheet must be printed and a hard copy must be signed and submitted. Any adjustments to the timesheet must be signed and initialed by both the employee and the supervisor, with an explanation for the reason of the change.

Expenses and Shared Costs

For all direct expenses and shared costs, Provider must include the following back-up for invoices.

- **Documentation:** All direct expenses require receipts or supporting documentation to be eligible for reimbursement.
- **Shared Expense Allocation:** Provider may charge a percentage of shared expenses (e.g., rent, insurance) based on the ratio of Program-dedicated FTEs to the total agency employee count. $(\text{Program FTEs} / \text{Total Agency Employees}) = \text{Allowable \% of Shared Expenses}$.

For example, in the case if a Service Provider assigns 2 FTEs to the program out of 20 total agency FTEs, the Service Provider may charge up to 10% of general operational expenses (e.g. rent, insurance) to Program. FTE percentages may be annually updated, and any budget modifications may be requested on as needed basis. **Please note that indirect costs**

are not allowed according to the Transitional Guidelines, so the Provider must use the shared expense allocation approach for shared costs.

Each ADC & Program Administration invoice must include the following information:

- Payment ID
- Invoice Date
- Total Amount Requested (this includes staffing and line-item operational expenses)
- Documentation of clients served by the Program, in a format provided by the SGVCOG.

SGVCOG will provide all required invoice templates. All staffing and operational expense invoices and supporting documentation must be uploaded to the correct monthly SharePoint folder no later than the 10th day of each month. Upon review and approval, SGVCOG will issue a reimbursement payment.

Data Management, Reporting, and Oversight

The SGVCOG is responsible for providing data management, facilitating reporting, and ensuring Program oversight. The SGVCOG shall use the processes described in the following sections to complete these tasks.

Data Management

The Transitional Guidelines require that each Eligible Jurisdiction have a comprehensive data management system that allows jurisdictions to collect data related to the risk of homelessness, reductions in homelessness, displacement and displacement risk, as well as trends in rents and evictions. Each Eligible Jurisdiction must track household-level program data. The SGV Home Portal shall be used to manage and track all Program data. The Portal will not only track the required Program metrics (i.e. financial assistance, service matching, etc.) but ensure it flags duplication of benefits to prevent households from receiving overlapping Measure A assistance or exceeding funding limits.

Each Provider must use the Portal to track client data specifically on referrals, enrollment, service matching, financial assistance allocation, and exits. This will ensure that the SGVCOG is able to track all required data.

Reporting

The Transitional Guidelines require that data must be collected related to the risk of homelessness and reductions in homelessness, displacement and displacement risk, rents, and evictions in the region. Annual reports will be required to provide information on households served and expenditures, as well as household composition and demographics, eligibility factors such as income, housing status, and qualifying crises, prioritization criteria, expenditure categories and amounts, program duration, and the housing destination of participants when they exit the program.

The Portal will be used to collect this data. **Service providers are not required to enter or report client information in their own systems.** The Portal will serve as the primary tool for generating

reports. In addition, using the Portal, the SGVCOG will provide reporting on a city-level basis regarding the level and type of services being provided to each participating jurisdiction.

Oversight & Provider Expectations

As implementers of SGV Home, Providers play a critical role in ensuring the success of the Program. Any Provider that is an implementer of SGV Home must comply with the following criteria:

- Must ensure that the Provider agency is implementing these Guidelines correctly, including but not limited to
 - Eligible clients are enrolled;
 - Collection of required documentation;
 - Timelines for enrollment and client exit;
 - Completion of service requirements;
 - Evaluation and disbursement of Financial Assistance.
- Ensure staff is assigned and trained in the SGV Home Program. Should a designated staff person leave during Program implementation, the Service Provider is responsible for informing the SGVCOG immediately.
- Within 90 days of Program launch, each Provider must have at least 90% of their slots full. If this target is not met, Provider must have a written plan for resolution.
- Must have SGVCOG-approved fraud detection policies and procedures in place that are being followed.

The SGVCOG will review this information on a regular basis and may request information from a Provider in order to verify that these criteria are being met. Additional criteria may be added as necessary to ensure successful Program implementation.

If a Provider is not meeting the Provider expectations, the SGVCOG reserves the right to terminate that Provider's participation in the implementation of the Program.

Client Grievances

As established in the Transitional Guidelines, participating and eligible households have the right to grieve any service that they believe was not properly delivered and to appeal any decision resulting in a denial or limitation of service. These procedures are required to be as accessible and supportive as possible.

The SGVCOG will oversee the grievance process. Clients will be able to submit a grievance in order to appeal any denial or limitation of services. Clients will be able to file a grievance anonymously or through an advocate. Should any interview or hearing take place, clients will have the option to have an advocate present.

Communication

The primary goal of the Program is to ensure a consistent implementation of the Program, so that each client has the same general experience, regardless of which Provider with which they are

working. As such, each Provider must maintain the same high-quality level of working relationship with the SGVCOG and each Provider. There should not be special and/or separate lines of communication between some Providers. All communication should be done through the appropriate channels. The SGVCOG will also hold regular meetings of all Providers to discuss implementation.

The SGVCOG must be included on any communication between Providers and between Providers and cities. This includes but is not limited to including SGVCOG staff in meetings, copying SGVCOG staff on emails, and including SGVCOG staff on scheduled phone calls. This is critical for the SGVCOG to ensure the appropriate implementation of the Program.

As a pilot Program, there are some things that may become more clear during Program implementation. If a Provider has any questions or runs into any issues in the implementation, they should reach out to SGVCOG staff immediately, to discuss the appropriate approach.

Attachment A – Eligible Jurisidictions

- Alhambra
- Arcadia
- Azusa
- Baldwin Park
- Bradbury
- Claremont
- Covina
- Diamond Bar
- Duarte
- El Monte
- Glendora
- Industry
- Irwindale
- La Canada Flintridge
- La Puente
- La Verne
- Monrovia
- Montebello
- Monterey Park
- Pomona
- Rosemead
- San Dimas
- San Gabriel
- San Marino
- Sierra Madre
- South El Monte
- South Pasadena
- Temple City
- Walnut
- West Covina

While this list of cities may appear eligible under the RPHP Program guidelines, not all zip codes within these cities fall within the funded service jurisdictions. Zip codes (Attachment B) can fall under unincorporated areas that are not eligible for the RPHP program. Providers are required to verify the full address each participant reports, including the zip code, city, and jurisdictional boundaries to validate a participant meets Criteria 1. The City of Pasadena and unincorporated community of Altadena are not part of the SGVCOG's program, as its RPHP funds are being allocated to the Burbank-Pasadena-Glendale Regional Housing Trust.

Attachment B – Eligible Zip Codes

City	Zip Codes	Supervisory District (1 - Solis & 5 Barger)
Alhambra	91801, 91802, 91803, 91804	1
Arcadia	91006, 91007, 91066, 91077	5
Azusa	91702	1
Baldwin Park	91706	1
Bradbury	91008	5
Claremont	91711	5
Covina	91722, 91723, 91724 *Note: Street numbers higher than 2999 are not City of Covina addresses but are located in unincorporated areas of Los Angeles County. The County of Los Angeles has local government jurisdictions over Covina properties with street addresses of 3000 and higher.	1
Diamond Bar	91765, 91789 (shares with Walnut)	1
Duarte	91108 (shares with Bradbury, with some unincorporated areas in this zip code), 91109, 91009	5
El Monte	91731 (North El Monte, unincorporated), 91732, 91733 (Located to the west of the San Gabriel River, this is unincorporated area/share with South El Monte is covered by this zip code), 91734, 91735, 91780	1
Glendora	91740, 91741, 91750, 91773 Unincorporated areas in the vicinity of Glendora include Charter Oak (91722, 91724) and Citrus (91702, 91722), which are separate from the city itself and have their own zip codes.	5
Industry	90601, 91714, 91715, 91716, 91732, 91744, 91745, 91746, 91748, 91749, 91765, 91789	1

	There are unincorporated areas in the vicinity, such as Rowland Heights, but these are not part of the City of Industry (91748, 91789, 92821)	
Irwindale	91006 (share with Arcadia) 91010 (shares with Duarte) 91706 (shares with Baldwin Park)	1
La Canada Flintridge	91011, 91012	5
La Puente	91744 (serves the Unincorporated community of West Puente Valley and South San Jose Hills), 91746 (Serves the unincorporated community of West Puente Valley), 91745, 91747, 91749	1
La Verne	91750	1 (portion), 5 (portion)
Monrovia	91016, 91017 Neighboring unincorporated areas, Mayflower Village, served by both 91016 and 91006. Other areas near Monrovia include South Monrovia Island, but no zip code is detailed	5
Montebello	90640	1
Monterey Park	91754, 91755, 91756	1
Pomona	91766, 91767, 91768, 91769	1
Rosemead	91770, 91771, 91772	1
San Dimas	91773	5
San Gabriel/ East San Gabriel	91775 (Unincorporated includes parts of East Pasadena), 91776, 91778	1, 5 (East San Gabriel)
San Marino	91108, 91118	5
Sierra Madre	91024, 91025	5
South El Monte	91733	1
South Pasadena	91030, 91031	5

Temple City	91780	5
Walnut	91788, 91789, 91795	1
West Covina	91790, 91791, 91792, 91793	1

Please note: The City of Pasadena and unincorporated community of Altadena are not part of the SGVCOG's program, as its RPHP funds are being allocated to the Burbank-Pasadena-Glendale Regional Housing Trust. Applicants with the following zip codes will be referred to their program:

- 91101
- 91011
- 91101
- 91001
- 91102
- 91103
- 91104
- 91105
- 91106
- 91107
- 91108
- 91109
- 91110
- 91114
- 91115
- 91116
- 91117
- 91121
- 91123
- 91124
- 91125
- 91126
- 91129
- 91182
- 91184

Attachment C – Service Provider Assignments

City	Service Provider
Alhambra	Union Station
Arcadia	Union Station
Azusa	Sycamores
Baldwin Park	Sycamores
Bradbury	Union Station
Claremont	Support Solutions
Covina	Support Solutions
Diamond Bar	God's Pantry
Duarte	Sycamores
El Monte	Union Station
Glendora	Sycamores
Industry	Sycamores
Irwindale	Sycamores
La Canada Flintridge	Union Station
La Puente	God's Pantry
La Verne	Support Solutions
Monrovia	Sycamores
Montebello	Union Station
Monterey Park	Sycamores
Pomona	God's Pantry
Rosemead	Union Station
San Dimas	Support Solutions
San Gabriel	Union Station
San Marino	Union Station
Sierra Madre	Union Station
South El Monte	Support Solutions
South Pasadena	Union Station
Temple City	Union Station
Walnut	Support Solutions
West Covina	God's Pantry

Attachment D – Client Application Form Documentation

Information Requested	Purpose	Documentation/Action Required
1. Referring Entity	Allow service provider to follow-up with referring entity as appropriate	None
2. Referring Entity Contact Name		None
3. Referring Entity Contact Email		None
4. Referring Entity Contact Number		None
5. Assigned Service Provider	Identify assigned service provider	None
6. Client First Name	Verify client identity	Drivers' License or ID If not available, alternative method of identity verification must be approved by the SGVCOG
7. Client Last Name		
8. Client Date of Birth		
9. Client Drivers License or Identification Number		
10. Client Address	Ensure client eligibility	<ol style="list-style-type: none"> 1. Drivers License or ID 2. Lease 3. Utility or Other Bill 4. Other Mail 5. Communication with landlord/property owner 6. Self-Attestation
11. Client City of Residence		
12. Client Zip Code		
13. Verification of previous client enrollment in another RPHP Program	Check duplication of benefits	<ol style="list-style-type: none"> 1. Verify in Homeless Management Information System (HMIS) 2. Verify with LACAHS 3. Verify with CalAIM, other state benefits

<p>14. List of Names and Ages of all Household Residents</p>	<ol style="list-style-type: none"> 1. Check duplication of benefits for household residents 2. Autocalculate the number of residents in the household 3. Verify Financial Assistance Funding Limits for Client 	<ol style="list-style-type: none"> 1. Drivers License or ID 2. Birth Certificate 3. School Records 4. Self-Attestation
<p>15. Client preferred language of communication</p>	<p>Ensure high-quality client communication</p>	<p>None</p>
<p>16. Client preferred method of communication (e.g. email, text, phone call)</p>		
<p>17. Client Income</p>	<p>Ensure client eligibility</p>	<ol style="list-style-type: none"> 1. Pay stubs 2. Public Benefits Statements 3. Termination Letter 4. Tax Forms 5. Employment verification statement stating salary or hourly rate 6. Direct deposit bank statements indicating regular income
<p>18. Check-box for self-attestation of income</p>	<p>Document use of client self-attestation for client income</p>	<p>Self-Attestation</p>
<p>19. Verification that client is a renter</p>	<p>Ensure client eligibility</p>	<p>None</p>
<p>20. Verification whether a copy of the lease is available</p>	<p>Document availability of lease or other documents</p>	<p>Lease</p>
<p>21. If no lease, verification of what other documentation was available</p>		<ol style="list-style-type: none"> 1. History of payments 2. Communication with landlord 3. Utility bills 4. Other documentation

		<ul style="list-style-type: none"> 5. Landlord or Property Management Verification Statement 6. Eviction Notice 7. Rent receipts 8. Renter's Insurance Policy 9. Bank statements withdraws indicating monthly rent payment 10. Self-Attestation
22. Documentation of Qualifying Event	Ensure client eligibility	<ul style="list-style-type: none"> 1. Action of landlord 2. Eviction lawsuit 3. Threat of displacement 4. Loss of income 5. Loss of public benefits 6. Medical Emergency 7. Other Similar Event
23. Brief Description of Qualifying Event		
24. Check-box for self-attestation of qualifying event	Document use of client self-attestation for qualifying event	Self-Attestation
25. Verification whether the client is currently living in subsidized housing (e.g. emergency housing vouchers; other housing voucher)	Verify Financial Assistance Type Availability for Client	Lease
26. Verification of type of subsidized housing		
27. Head of Household Gender	Evaluate availability of resources for clients	None
28. Head of Household Race/Ethnicity		
29. Prioritization Criteria	Prioritize clients	<p>Confirm that clients meet one or more of the following criteria:</p> <ul style="list-style-type: none"> • Formerly Homeless • Older Adult • Client with Disability • Family with non-school age minor children • Head of Household under 25

		<ul style="list-style-type: none"> • Undocumented Individuals • Fixed Income • Fleeing domestic violence
30. HMIS Duplication of Benefits Check	Duplication of Benefits Check	Verify in HMIS that neither the client nor any member of the household are not enrolled in and/or receiving benefits from a similar LAHASA program
31. LACAHSR Duplication of Benefits Check		Verify in HMIS that neither the client nor any member of the household are not enrolled in and/or receiving benefits from a LACAHSR RPHP Program
32. CalAIM Duplication of Benefits Check		Verify that neither the client nor any member of the household are not enrolled in and/or receiving benefits from CalAIM
33. Self-Attestation from Client that no member of household is enrolled in and/or receiving benefits from any other program		Self-Attestation