## Responses to Questions October 24, 2025

- 1. What is the total dollar amount allocated for the outreach/education + eviction defense portion of this overall funding opportunity?
  - o Answer: The Transitional Program Guidelines from the Los Angeles County Affordable Housing Solutions Agency (LACAHSA) establish funding requirements that will be followed in the implementation of the SGVCOG's Program. The LACAHSA Transitional Program Guidelines establish a 25% cap on Activity Delivery Costs (ADCs) for Renter Protection and Homelessness Prevention (RPHP) activities, which would include outreach activities. Please see pages 56-57 of the LACAHSA Transitional Guidelines for more detail on the definition of Activity Delivery Costs. The SGVCOG allocation is \$8,581,272, so the Activity Delivery Cost cap is \$2,145,318. The LACAHSA Transitional Guidelines also establish that an eligible jurisdiction must spend at least 20% of its RPHP allocation on "Legal Services (inclusive of eviction defense and other legal services) (see LACAHSA Transitional Guidelines)" (36). The SGVCOG allocation is \$8,581,272, so at least \$1,716,240.40 must be expended on Legal Services. Beyond any requirements established in the LACAHSA Transitional Program Guidelines, the process of allocating resources between eligible and required activities will be done during the SGVCOG's RPHP planning process, in coordination with the selected entities.
- 2. Is funding available for salary and fringe costs for supervisory staff? Should those positions be included in the staffing table in the application?
  - O Answer: Funding is available for all staff that work on the RPHP, whether in a direct implementation (which LACAHSA defines as "activity delivery costs") or administrative role. Entities should review page 56-57 of the <u>LACAHSA Transitional Guidelines</u> to determine whether supervisory staff would be defined under an activity delivery cost or administrative cost.

All positions that might be anticipated to work on an RPHP program should be included in the staffing table in the application, including administrative positions. The application form has been revised to allow entities to indicate if a position might have an "administrative" role or "other" role.

If an entity has already begun completing the original application and wishes to submit that version, it may do so.

- 3. How do you define indirect costs and administrative costs? Can you provide examples? Are supervisors administrative?
  - O Answer: As stated within the LACAHSA Transitional Guidelines, "Program Administration costs include costs for staff-time and overhead costs for planning, general management, oversight, coordination, and implementation of the program as a whole. These are costs that cannot be directly attributed to a single project or activity" (57). More information on administrative costs can be found on page 57

of the LACAHSA Transitional Guidelines. Entities should review page 56-57 of the <u>LACAHSA Transitional Guidelines</u> to determine whether supervisory staff would be defined under an activity delivery cost or administrative cost.

As stated in the LACAHSA Transitional Guidelines, "Indirect costs as allocated by an indirect cost rate are not allowed. All such costs should be included in the Eligible Jurisdiction/Subrecipient's ADCs and Program Administration Costs" (57).

- 4. Can you clarify if the renter education can be separated out from all other marketing activities or is it the COGs intent to couch all services under one marketing program?
  - Answer: Renter Education is an eligible activity that is defined in the application ("Legal Services and Renter Education"), so any entity that is interested in applying for that eligible activity may submit an application for that activity.
- 5. If we have subrecipients, are their budgets held to the same policy related to indirect?
  - Answer: Yes. All recipients and subrecipients (including subcontractors of subrecipients) must comply with the LACAHSA Transitional Program Guidelines related to indirect costs.
- 6. What is the contract term? Is it one year beginning January 2026?
  - o **Answer:** Initial contracts for participation in the planning process are anticipated to be executed in mid-November 2025, with contracts for the full program implementation anticipated to be executed in January 2026. This initial process will be to implement the SGVCOG's approximately \$8.5 million allocation of FY 2025-26 RPHP funds, under the LACAHSA Transitional Guidelines adopted by the LACAHSA Board in September 2025. The LACAHSA Transitional Guidelines are only anticipated to be in place until June 2026, so we cannot execute contracts with entities beyond that time. If possible, we will look to continue the Program as designed beyond June 2026; however, it will be dependent on future guidelines adopted by LACAHSA and funding availability for fiscal year 2026-27.
- 7. Regarding how time and labor is charged to the contract does it need be based on actual hours vs average hours based on established FTE? Asking as this information will impact our internal assessment regarding whether we have processes/internal controls in place to perform this work.
  - O Answer: The LACAHSA Transitional Program Guidelines establish the documentation standards for program administration costs and Activity Delivery Costs, including for time and labor charged to the contract (see pages 58-59 of the Transitional Program Guidelines for more information). As the Eligible Jurisdiction and direct recipient of LACAHSA funds, the SGVCOG will be responsible for ensuring that "administrative costs are reasonable, allowable, and allocable to the Project" (58) and for collecting and maintaining documentation for both administrative and activity delivery costs that "clearly supports the nature, amount, and purpose of expenditures" (59). The SGVCOG must maintain "comprehensive records" that "ensures compliance with funding requirements, facilitates audits, and enhances financial accountability" (59).

Please note that for this application, the SGVCOG is only requesting information on position and wage rate information and is not requesting information on the proposed FTEs. Upon completion of the SGVCOG's RPHP planning process (anticipated in late 2025), the SGVCOG will work with each entity to determine the appropriate number of FTEs for each position, based on the determined implementation approach. This will be done prior to executing the implementation agreement between the SGVCOG and the entity.

- 8. What documentation do you require to show how we determined the allocation of overhead to the project?
  - Answer: Many components of overhead would likely be defined as "Program Administration costs." The <u>LACAHSA Transitional Guidelines</u> define the required documentation standards for program administrative costs (Please see page 58 of the LACAHSA Transitional Program Guidelines). The LACAHSA Transitional Program Guidelines state that administrative costs must be "reasonable, allowable, and allocable to the project" (58). As stated in the LACAHSA Transitional Guidelines, "Indirect costs (or overhead) as allocated by an indirect cost rate are not allowed. All such costs should be included in the...ADCs and Program Administration Costs" (57).

While entities can include administrative staff positions in the staffing table in the application, the SGVCOG is not requesting any additional information on overhead or other non-personnel administrative costs at this time.

- 9. Can you clarify whether we're required to charge time and labor to this contract based on actual hours worked by staff, or if it's acceptable to allocate costs based on estimated hours or percentages established at the start of the contract? For example, we typically estimate how much time Employee A will spend on Contract X and charge that contract based on that projected percentage, rather than having them track and record actual hours worked on the contract.
  - O Answer: The SGVCOG is responsible for ensuring that there is documentation that "clearly supports the nature, amount and purpose of expenditures." <u>LACAHSA Transitional Guidelines</u> do allow for "self-certification reporting" in order to report time spent on ADCs and program administration. This will be paired with the documentation requirements that align with the LACAHSA Transitional Guidelines (pages 58-59) and the SGVCOG's Accounting Policies & Procedures. All entities will be required to provide sufficient documentation that administrative costs are "reasonable, allowable, and allocable to the project" (LACAHAS Transitional Guidelines 58) and that shows the "nature, amount and purpose of expenditures" (LACAHSA Transitional Guidelines 59).

Please note that for this application. the SGVCOG is only requesting information on position and wage rate information and is not requesting information on the proposed FTEs.

10. Per the RFP, there is approximately \$8.5 million in funding available to the SGVCOG through the LACAHSA RPHP Program. Can you clarify what the funding term is (6-months, 12-months) for this \$8.5 million?

**Answer:** The SGVCOG has been allocated \$8,581,272 for FY2025-26. The SGVCOG has 12 months upon allocation to expend these funds; however, given that the LACAHSA Transitional Guidelines are only in place until June 2026, we will not be able to execute agreements that extend past June 30, 2026. It is the SGVCOG's intention to amend and extend agreements with service providers when the LACAHSA adopts updated RPHP guidelines.

- 11. The LACAHSA RPHO Program Guidelines state that jurisdictions must spend at least 20% of their allocation on Legal Services. Can you confirm that \$1,700,000 (representing 20% of the total \$8.5 million LACAHSA RPHP Program funding) is the mandated minimum allocation for Legal Services?
  - o **Answer:** Yes, as stated in the LACAHSA Transitional Guidelines, 20% of an Eligible Jurisdiction's allocation must be spent on Legal Services. Given that the SGVCOG's FY2025-26 allocation is \$8,581,272, the minimum expenditure for "Legal Services" is \$1,716,254.40.
- 12. Does the \$1.7 million allocation for Legal Services include "Renter Outreach and Education" services and activities?
  - Answer: It is the SGVCOG's understanding from the LACAHSA Transitional Guidelines that the minimum allocation for legal services includes both legal services and renter education. However, we have sought clarification from LACAHSA staff to confirm.

Please note that the SGVCOG is not seeking any budget allocation requests from entities as part of this application process. Entity-specific budgets for implementation will be established after the planning process has been completed.

- 13. If "Renter Outreach and Education" is part of the Legal Services allocation, what, if any, is the specific breakdown of cost allocation between legal services and renter education? (For example, are legal services required to account for 80% of costs, with renter outreach and education covering the remaining 20%?)
  - Answer: It is our understanding from the LACAHSA Transitional Guidelines that there is not a required breakdown between renter education and legal services activities.
- 14. The guidelines state that "Activity Delivery Costs" are capped at 25% of the total legal services allocation. Confirming: Does this mean that out of the \$1.7 million designated for legal services, a maximum of \$425,000 can be allocated for "Activity Delivery Costs"?
  - o **Answer:** Yes, that is our understanding of the LACAHSA Transitional Guidelines.
- 15. Beyond staffing, what specific expenses are classified as "Activity Delivery Costs"?

  Answer: The LACAHSA Transitional Guidelines define Activity Delivery Costs as "direct expenses related to implementing the program's objectives and delivery services to households. These costs include determining eligibility, reviewing

required documentation, communication with households, and providing direct financial assistance or service to participants seeking assistance. Examples of ADCs include: efforts to market, assess, and enroll potential households into RPHP activities; ongoing case management services" (56). The SGVCOG encourages entities to review pages 56-57 of the <u>LACAHSA Transitional Guidelines</u> for more information on "activity delivery costs."

- 16. If \$425,000 is allocated to "Activity Delivery Costs", what types of expenses should be allocated to the remaining \$1,275,000 in the Legal Services and Renter Education budget?
  - Answer: Expenses for the remaining funding in the "Legal Services and Renter Allocation" budget should align with the eligible activities outlined on pages 41-42 in the LACAHSA Transitional Guidelines.

Please note that the SGVCOG is not seeking any budget allocation requests from entities as part of this application process. Entity-specific budgets for implementation will be established after the planning process has been completed.

- 17. Is there a maximum amount that each agency can apply for?
  - Answer: The SGVCOG is not seeking any budget allocation requests from entities as part of this application process. Entity-specific budgets for implementation will be established after the planning process has been completed.