



FY 2025-2026 CDBG CAPITAL IMPROVEMENT PROJECTS REQUEST FOR PROPOSALS

INSTRUCTIONS

I INTRODUCTION

The City of Glendale is soliciting proposals from public and community non-profit agencies for Capital Improvement Projects to be funded under its **FY 2025-26 Community Development Block Grant (CDBG)** program. The CDBG program is funded by the federal Department of Housing and Urban Development (HUD). Through this program, HUD provides a formula entitlement grant to the City to fund projects which aid in the development of viable urban communities, and which meet one of two broad national objectives. These objectives are:

- 1) To benefit low and moderate-income persons; or
- 2) To aid in the prevention and elimination of slums and blighted areas.

The total estimated amount of funding available to public and community non-profit agencies for Capital Improvement Projects through the FY 2025-2026 CDBG Request for Proposal (RFP) process based on a City Council approved preliminary funding allocation plan, is **\$605,000**.

Eligible Capital Improvement Projects include:

A. Community Centers/Public Facilities:

Eligible activities include: acquisition, relocation, rehabilitation, construction or expansion of a city-owned and sponsored, other public agency-owned and sponsored, or non-profit community agency-owned and sponsored, community center, building, housing facility or facility that is used to provide services or housing to low- and moderate-income families, youth, seniors, or persons with special needs, such as homeless, persons fleeing domestic violence, or disabled; public school facilities serving low- and moderate-income families and youth; ADA accessibility modifications to buildings; and parks and playgrounds.

- B. Predevelopment costs are not eligible for CDBG funding. Predevelopment costs are defined as proposal/grant writing fees, planning studies, engineering, design, architectural and all building permits prior to construction or rehabilitation of the building.

II SUBMISSION INFORMATION

A. General Instructions

For funding consideration, all projects funded through the CDBG Program must meet the Pre-Qualifications, General Requirements and CDBG Program Guidelines defined in Sections III, IV and VI of the RFP. Public and community non-profit agencies responding to this RFP must complete the ZoomGrants pre-qualification questions prior to being approved to submit a proposal for CDBG Capital Improvement Project.

All applications submitted by a public or community non-profit agency, must be submitted in the legal name of the organization. An authorized representative of the organization who has the legal authority to enter into an agreement with the City of Glendale.

Updated Policies:

Agencies must attend the Mandatory CDBG Technical Support Meeting as a requirement of submitting a CDBG Request for Proposal for Capital Improvement Projects.

Agencies cannot be funded for more than two (2) CIP projects at any one time, can only apply for one project at a time in any given program year, and can only submit a proposal for a second capital improvement project if their first funded project is already in construction and will be completed within a year of the application date.

A commitment to the timely completion of CIP projects reflected in the necessary completion of Project Planning and Design Phases. The proposal should reflect project readiness and completion, or near completion, of the following pre-construction activities:

- *Feasibility studies*
- *Conceptual designs*
- *Pre-schematic work*
- *Schematic documents and plan documentation*
- *Technical consulting*
- *Construction Documents and/or specifications*
- *Permits (status of plan check)*

Applications must be received by 11:59 p.m. on Friday, January 10, 2025.

Applications that do not meet the pre-qualification requirements **will not** be considered for funding. Changes and/or additions to the proposal after the submission will not be accepted as part of the original proposal submission.

Once all applications are received, proposals will be analyzed by City staff as to completeness in addressing questions in the Funding Application, or other funding requirements. A staff analysis will be prepared identifying strengths and weaknesses (Strength & Weakness Analysis).

The Strength & Weakness Analysis will be sent to proposing organizations the first week of February 2025. Responses by the applicants to the staff Strength & Weakness Analysis must be received by the second week of February 2025.

The City will disqualify incomplete proposals where an agency fails to properly respond and correct for the weaknesses in their application which were identified on the Strength and Weakness Analysis.

The original proposal, the staff Strengths & Weaknesses analysis and the response to the Strengths & Weaknesses Analysis will be reviewed and evaluated by a City Council appointed citizen CDBG Advisory Committee. Representatives from proposing organizations will be required to attend the **MANDATORY** CDBG Advisory Committee meeting to discuss their proposal and be interviewed by the CDBG Advisory Committee.

The date for these interviews is **tentatively** scheduled for **Friday, February 28, 2025**, from 8:00 a.m. to 5:00 p.m. and **Monday, March 3, 2025** from 9:00 a.m. to 3:00 p.m. Our office will notify you of the exact time and location of your interview after we receive your funding application. Upon completion of the interviews, the CDBG Advisory Committee will make funding recommendations to the City Council based on a combination of the written proposal, the response to the staff analysis, and the interviews. A public hearing on these funding recommendations will be held approximately the first week of April 2025 and the City Council/Housing Authority will vote on the CDBG program recommendations in **May 2025**.

B. RFP Information/Technical Assistance Meeting

A MANDATORY Technical Assistance Meeting will be held on Wednesday, December 4, 2024.

The purpose of the meeting is to provide information and technical assistance to any party interested in responding to the RFP. Community agencies and City departments must attend the Technical Assistance Meeting in order to submit a grant application for FY 2025-2026.

Additional technical assistance for completing the CDBG Capital Improvement Funding Application may be requested by calling Maggie Kavarian, Community Services Manager at (818) 548-3715.

C. Environmental Review and Clearance

All approved projects will require environmental clearance from the City of Glendale Community Development Department's Planning Division. The Planning Division provides environmental assessments as required under the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). All CDBG projects must undergo environmental review in accordance with NEPA and if required, the Historic Preservation requirements set forth in the National Historic Preservation Act of 1966. The Planning Division will determine what level of environmental processing is required. The project and associated permits may also require approval from other City, State or Federal bodies such as the Environmental Planning Board, the Historic Commission, the State Office of Historic Preservation, etc.

HUD NEPA Review: *Effective 4/11/24, as part of the NEPA review, a new policy has been added regarding Radon. If awarded CDBG CIP funding, your agency **may be** required to provide proof of Radon testing for the existing building(s). For additional information regarding this policy, please call (818) 548-3715 to assess your project. Radon testing is considered a pre-construction cost and must be leveraged by your agency.*

Applicants proposing to submit a capital improvement proposal should refer to **Exhibit A- CDBG CIP Checklist** as a readiness tool for the proposed project.

III **PRE-QUALIFICATIONS**

A. Eligibility as a Sub-recipient

Applicants for CDBG Capital Improvement funds must meet the CDBG definition of Sub-recipient: a public or private nonprofit agency, authority or organization. Community non-profit applicants must be able to demonstrate proof of tax-exempt nonprofit status under Section 501(c)(3) of the Internal Revenue Code and Section 23701d of the California Revenue and Taxation Code.

B. Financial Statement

Applicants for CDBG Capital Improvement funds must submit an annual financial statement or audit for the past two consecutive years along with their funding application. The financial statement or audit shall consist of either: 1) an unaudited financial statement compilation, 2) an annual independent financial audit in accordance with generally accepted auditing standards and General Auditing Standards, issued by the Comptroller General of the United States, or 3) a Single Audit under Part 200—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Subpart F-Audit Requirements §200.501 and §200.514. Applicants without two years of financial statement compilations or independent financial audits shall not be eligible to submit a funding application.

Applicants must include a Financial Ratio Calculator (**See Exhibit H**) with their financial statements which must be completed and signed by their certified public accountant. The link to the Financial Ratio Calculator worksheet is on the City's website at <http://www.glendaleca.gov/cdbg> and in **Zoom Grants Library Tab**.

Applicants for CDBG Capital Improvement funds must submit copies of official Board meeting minutes that include documentation of submission, review and approval of year-end financial statement reports by the Board.

Applicants for CDBG Capital Improvement funds shall be responsible for maintaining documentation on the resume of the Chief Financial Officer of the organization, and/or Board Treasurer, and identify a certified public accountant (firm) responsible for preparing financial statement compilations or financial audits.

C. Quarterly Payroll Taxes

Applicants must submit a copy of receipt of payment of **most recent** Federal and State quarterly payroll taxes (IRS Form 941). Please DO NOT include details of the employees' social security number or information.

IV GENERAL REQUIREMENTS:

A. Operating Agreement

Applicants approved for CDBG funding will be required to sign a Sub-recipient Operating Agreement with the City of Glendale to ensure compliance with City of Glendale, Community Development Block Grant Program, Federal Executive Orders, and HUD regulations. CDBG funds are subject to federal and local regulations including, but not limited to: non-discrimination, equal opportunity, accessibility, lead-based paint, prevailing wages, Uniform Relocation Act, audits, procurement and environmental review. Additional requirements can be found in the CDBG regulations and Uniform Administrative Guidance 2 CFR Part 200 http://www.ecfr.gov/cgi-bin/text-idx?SID=60623b20e6213558b4aa6ab7eb76b619&node=2:1.1.2.2.1.3&rgn=div6#se2.1.200_1212

Applicants are encouraged to familiarize themselves with these requirements prior to applying for funds to ensure that their organizations have adequate administrative capacity and processes in place.

B. Matching/Leveraged Funds:

Applicants approved for CDBG funding that propose matching or leveraged funding to complete their capital improvement construction project will be required to verify that construction funding is in place prior to beginning construction as follows:

- 1) Private funding used as match or leverage must be deposited into a third-party construction project account.
- 2) Bank loan funding used as match or leverage will require that a loan commitment letter be obtained and verified and funds drawn from the bank or a third party escrow account.
- 3) Other grant funding used as match or leverage will require award letters and receipt and deposit of funds or verification of letter of credit.

C. Management:

On all capital improvement projects for public and community non-profit agencies approved for CDBG funding over \$15,000, the City shall record a Deed of Trust against the property that is being improved or developed, to secure the City's interest.

Prior to the execution of any agreement, the City will obtain a market appraisal of the property and a preliminary title report to determine that the non-profit organization owns enough equity in the property for the City to be repaid its interest if it were to become necessary and to ascertain the City's equity position in relation to all other liens on the property.

On capital improvement projects on properties not owned by the non-profit organization, the City will secure its interest by executing a Deed of Trust against another property owned by the non-profit organization. If the non-profit organization does not own other property, staff will submit a report to City Council to request approval to execute a sub-recipient agreement based on a promissory note.

D. Non-discrimination in Services and Employment

Applicants approved for CDBG funding shall not, in accordance with Federal law, discriminate in the provision of services hereunder because of race, color, religion, national origin, ancestry, sex, age or physical or mental handicap as identified in Section 109 of the Act, Section 504 of the Rehabilitation Act, the Age Discrimination Act of 1975, the Americans with Disabilities Act of 1990, and 24 CFR 570.602. In addition, Sub-recipients shall not discriminate in the provision of services hereunder because of religious belief, creed, medical condition, blindness, sexual orientation, marital status, pregnancy, parenthood, citizenship, gender identity, domestic partner status or AIDS or HIV status.

Further, public and community non-profit agencies approved for CDBG funding shall certify and agree not to discriminate against any employee or person who is employed or compensated in whole or in part using CDBG funds because of race, color, creed, religion, religious belief, national origin, ancestry, citizenship, age, sex, sexual orientation, marital status, pregnancy, parenthood, medical condition, physical or mental disability, gender identity, domestic partner status or AIDS or HIV status.

E. Insurance

Applicants approved for CDBG funding will be required to obtain insurance, evidenced by an original certificate of insurance and endorsement. **(See Exhibit G1-G5)**

F. Program Reporting/Monitoring

- a. Applicants approved for CDBG funding will be required to maintain and submit to the Community Services & Parks Department adequate program or demographic data and reports necessary on an annual basis for **two years** after the completion of the project to monitor program eligibility in accordance with City of Glendale, Community Development Block Grant Program and HUD regulations.
- b. Applicants approved for CDBG Solar Panel funding will be required to maintain and verify through an accounting system where utility cost savings from solar panel installation is being applied. This will be done annually for a **five-year** period post energization of the solar system, in addition to the requirements in Section F. a.

G. Political Activities

Applicants approved for CDBG capital improvement funding shall understand that pursuant to 24 CFR 570.207 (a) (3) CDBG funds shall not be used for programs that involve the engagement of political activities, such as partisan political campaigns, candidate forums, voter transportation, or voter registration. However, a facility originally assisted with CDBG funds, for acquisition or rehabilitation over time may be used on an incidental basis to hold political meetings, candidate forums, or voter registration campaigns, provided that all parties and organizations have access to the facility on an equal basis, and are assessed equal rent for use charges, if any.

H. Financial Control Systems and Audits-Non-profit Organizations

Applicants approved for CDBG Capital Improvement funding (Agency) shall comply with 2 CFR 200 Subpart D-Post Federal Award Requirements, §200.300- 200.345 which includes maintaining accounting principles and procedures required therein, utilizing adequate internal and budget controls, and maintaining necessary source documentation and accounting records that sufficiently identify the source and application of CDBG funds. HUD standards for accounting records, per §200.302 shall require that agencies have in place an accounting system that at the minimum has the following elements: chart of accounts, cash receipts journal, cash disbursements journal, payroll journal, general journal and general ledger.

Internal Controls shall refer to a combination of policies, procedures, defined job responsibilities, personnel, and records that allow the Agency to maintain adequate oversight and control of its cash, property, and other assets charged to CDBG funded programs. Upon receiving funding, the Agency shall maintain written policies and procedures regarding approval authority for financial transactions, accounting manuals, chart of accounts, adequate separation of duties, hiring policies and access to accounting records as specified under 2 CFR §200.303.

Budget Controls shall refer to policies and procedures that the Agency must have in place to compare and control CDBG expenditures against the approved, appropriated CDBG budget. The Agency shall have procedures to compare actual expenditures with budgeted amounts for each CDBG grant as specified under 2 CFR §200.308-200.309.

Agencies receiving CDBG funds shall comply with current City and federal procurement standards under 2 CFR §200.317-200.326 concerning the procurement and purchase of equipment, supplies, and services using CDBG funds to ensure that they are obtained as economically as possible through an open and competitive process.

Procurement transactions must be conducted in a manner providing full and open competition consistent with the standards of the CDBG program and federal procurement regulations under 2 CFR §200.318. In order to ensure objective contractor performance and eliminate unfair competitive advantage, **contractors that provide bid quotes for the CDBG CIP RFP, develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements.**

Agencies shall maintain written standards of conduct covering conflicts of interest and governing the performance of employees, officers, and agents of the agency engaged in the selection of, award, or administration of a contract supported by CDBG funds under 2 CFR §200.318(c)(1).

Agencies receiving less than \$25,000 in CDBG funds per year shall be required to submit unaudited annual financial statements compilation for years where grant funds are received. The unaudited financial statements provided shall include an itemization of the receipt and use of the City CDBG funds. An attestation statement shall be provided by the Chief Executive Officer that the financial statements being submitted are true, correct, and free of any material misstatement and that funds were spent following the grant requirements.

Agencies receiving \$25,000 or more in CDBG funds per year shall be required to obtain an annual independent financial audit in accordance with generally accepted auditing standards and General Auditing Standards, issued by the Comptroller General of the United States for each grant year they receive CDBG funds.

In addition to a financial audit, Agencies receiving over \$750,000 in total federal grant funds in a year are required to conduct and file a Single Audit in accordance with financial audit requirements under Part 200—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Subpart F-Audit Requirements §200.501 and §200.514. The Agency shall be required to complete the Single Audit within 270 days after the ending date of the Agency's fiscal year.

All agencies shall be required to provide evidence on a quarterly basis verification of quarterly state and federal payroll tax payments including supporting source documentation for each employee covered by the CDBG grant.

V HUD CHURCH/STATE GUIDELINES

CDBG funding may not be used for the acquisition, construction, or rehabilitation of structures to the extent that those structures are used for inherently religious activities. CDBG funds may be used for the acquisition, construction or rehabilitation of structures only to the extent that those structures are used for conducting eligible CDBG non-religious community social service programs. Where a structure is used for dual religious and non-religious community programs, the eligible use of CDBG funds shall be based on a formula resulting from the prorated use between religious and non-religious activities.

Organizations that are directly funded under the CDBG program may not engage in inherently religious activities, such as worship, religious instruction, or proselytization, as part of the CDBG eligible community programs or services.

VI CDBG PROGRAM GUIDELINES

The Eligibility criteria and requirements for documentation of eligibility for program activities and facility improvement activities are described below. Each organization receiving CDBG Capital Improvement funds must spend all of the grant amounts it was allocated **within three years of award date.**

A. Eligibility Criteria

In order to be eligible for funding, the project must: 1) meet **one** of the CDBG National Objectives listed below, and 2) have a documented, demonstrated need for physical upgrade, development or expansion.

1) National Objectives:

- a) To benefit low and moderate-income persons where at least 60% of persons served by a community center, or benefiting from neighborhood revitalization activities are low and moderate-income persons (**See Exhibit C Income Limits**), or
- b) To aid in the prevention or elimination of slums and blight relative to buildings, and only to the extent necessary to eliminate severe and specific conditions detrimental to public health and safety, i.e. elimination of faulty wiring, roofing, falling plaster or other similar conditions which are detrimental to all potential occupants.

2) Demonstrated Need:

The project application must identify and describe the substandard condition(s) of the subject facility. If the project is for expansion, then the application must describe the need for expansion and/or improvement to the existing or proposed facility to increase service levels, i.e. what programs will benefit from the project?

B. Requirements for Documentation of Eligibility

- 1. Applicants approved for funding for improvements to community and public facilities must be able to document the following: 1) that at least 60% of persons attending or served by the portion of the center or public facilities improved with CDBG funds are low- and moderate-income persons or that there exists substandard conditions detrimental to public health and safety, 2) that the community center or public facility has a demonstrated need for improvement and/or expansion in order to increase service levels, and 3) that at least 60% of persons served are Glendale residents.

Acceptable forms of documentation are:

- a. Applicant Information Forms (**Exhibit E**) which includes name, address, income, source of income, household type, ethnicity, racial background, and signature of participant and all adult household members. In addition, agencies will be required to show adequate low-income backup data, including collecting a 10% sampling of income documentation of the program(s) operated by the Applicant within the facility that will be improved with CDBG funds. The number of sub-

recipient program clients to collect CDBG Applicant Information Forms for will be based on the CDBG Application for funding submitted to the City of Glendale.

- b. Location and description of service area boundaries, demonstrating that the proposed improvement project service area is within a low-income area (**See Census Tract Map, Exhibit B**). Location of an activity in a low-income area does not conclusively demonstrate that an activity benefits low- and moderate-income persons. Hence, where applicable, records of addresses of persons utilizing the facility will be required as documentation of benefit to low-and-moderate income persons. Applicants should contact Community Services & Parks staff for assistance with low-income area documentation.
- c. Official City building inspection reports detailing deficiencies detrimental to public health and safety, and
- d. General Contractor, architectural or engineering inspection reports detailing substandard conditions.

C. Eligible Improvements

Applicants are eligible to receive CDBG funding for the purpose of improving public community facilities. Such facilities must be operated so as to be open for use by the general public during all normal hours of operation. CDBG funds are not eligible to pay for predevelopment costs, such as planning studies, engineering, design, and permit fees.

Eligible Capital Improvement Project activities include:

- a) rehabilitation, including repair, directed toward an accumulation of deferred maintenance, replacement of principal fixtures and components of an existing community facility,
- b) installation of special features designed to promote energy efficiency or security,
- c) removal of material and architectural barriers that restrict the mobility and accessibility of elderly or severely disabled persons,
- d) construction or expansion of floor area of an existing community facility, and
- e) acquisition of property for the purpose of new construction or rehabilitation of a community facility.

D. Other Federal Requirements

Applicants receiving CDBG Capital Improvement Funds will be subject to comply with the following Federal regulations and requirements: Equal Opportunity Regulations, Disadvantaged Business Enterprise (DBE) goals, Federal Labor Standards provisions including prevailing wages, the Americans with Disability Act (ADA), Section 504 of the Rehabilitation Act of 1993, the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, the California

Environmental Quality Act (CEQA), the National Environmental Policy Act (NEPA), and the Historic Preservation requirements set forth in the National Historic Preservation Act of 1966.

Policy: Proposals must include one (1) General Contractor estimate that reflects prevailing wage rates, but a minimum of two (2) general contractor estimates are strongly recommended. **(See Exhibit I for updated prevailing wage rates)**

Build America, Buy America (BABA) Act

On November 15, 2021, the Build America, Buy America Act (the Act) was enacted as part of the Infrastructure Investment and Jobs Act (IIJA). Pub. L. 117-58. The Act establishes a domestic content procurement preference, the Buy American Preference (BAP), for Federal programs that permit Federal financial assistance to be used for infrastructure projects. In Section 70912, the Act further defines a project to include “the construction, alteration, maintenance, or repair of infrastructure in the United States” and includes within the definition of infrastructure those items traditionally included along with buildings and real property. Starting May 14, 2022, new awards of Federal financial assistance (FFA) from a program for infrastructure, and any of those funds obligated by the grantee, are covered under the Build America, Buy America (BABA) provisions of the Act, 41 U.S.C. 8301 note. The waiver, published March 15, 2023, establishes a phased implementation schedule for application of the BAP to covered materials and HUD programs. The BAP is applicable now to iron and steel used in covered CDBG projects, i.e. for projects using funds obligated on or after November 15, 2022. For CPD, the BAP will apply next to iron and steel used in covered Recovery Housing Program (RHP) projects for funding obligated on or after August 23, 2023.

The Phased Implementation waiver established the following implementation schedule for HUD programs:

BAP will apply to...	Iron and Steel	Specifically Listed Construction Materials	All Other Construction Materials	Manufactured Products
CDBG Formula Grants	All funds obligated on or after November 15, 2022	As of the date HUD obligates new FFA from FY24 appropriations	As of the date HUD obligates new FFA from FY25 appropriations	As of the date HUD obligates new FFA from FY25 appropriations

E. Program Priorities

Although all proposals will be given consideration, **preferential consideration will be given to community facility improvement projects that house and provide services in the areas of CDBG Program Priorities described on Section VII** or which in any other way will facilitate meeting any of the identified social service priorities as described below.

VII CDBG PROGRAM PRIORITIES

Program priorities for the FY2025-2026 CDBG Program have been assigned based upon findings derived from a comprehensive community needs assessment process. This process has identified social service priorities and capital improvement priorities. **(See Exhibit D)**

VIII CRITERIA FOR EVALUATION AND SELECTION OF PROPOSALS

A. Proposal evaluation criteria to be considered by the CDBG Advisory Committee in reviewing the proposals, the response to the staff analysis, conducting oral interviews, and in developing funding recommendations to the City Council are as follows:

- Program Priority
- Ability to Substantiate Community Needs and How Program Addresses Those Needs
- Target Population and Outreach
- Coordination and Collaboration
- Program Goals and Outcomes
- Implementation Plan-(Project Readiness)
- Budget, Cost Effectiveness and Leveraging of Funds
- Demonstrated Experience and Capacity of Sponsoring Organization/City Department
- Overall Financial Health of Sponsoring Organization
- Overall Likelihood of Success

For each proposal, and in consideration of the proposal's effectiveness in meeting all aspects of the Evaluation Criteria, the CDBG Advisory Committee shall rate each proposal out of a possible 100 points in ZoomGrants.

IX. CONDITIONS and RESERVATIONS

- A. The City of Glendale shall not, in any event, be liable for any costs incurred by applicants prior to entering into a formal contract. The costs of developing the proposals or any other such expenses incurred by the applicant in responding to the RFP, are entirely the responsibility of the applicant, and shall not be reimbursed in any matter by the City.
- B. The proposal must set forth full, accurate, and complete information as required by this application.
- C. The City of Glendale reserves the right to retain all submitted applications and the applications shall become the property of the City of Glendale. Applications may be disclosed under the California Public Records Act at a later date. Any department or agency of the City shall have the right to use any or all ideas presented in applications submitted in response to this RFP without any change or limitation. Selection or rejection of a proposal does not affect these rights.
- D. The City of Glendale reserves the right to communicate with funders or providers associated with the applicant to obtain additional clarification of design, program or agency fiscal and programmatic capacities and to utilize this information in the evaluation process. This includes verification of sources of match and leverage as stated within the application submission.

- E. The City of Glendale reserves the right to conduct scheduled and unscheduled site visits of agency applicants by City staff, County, State and Federal funding entities.
- F. The City of Glendale reserves the right to reject any or all applications received in answer to this RFP if deemed incomplete or inappropriate.
- G. The City of Glendale makes no representation that any contract will be awarded to any applicant responding to this RFP.
- H. The City of Glendale reserves the right to change application components, including services, costs, and program design, as it sees fit to better meet the City, Los Angeles County, and/or local requirements.