

Topic of	State	Description	Agencies Response to	Specific Resources
Governor's Resources for Small Business State & Fed Resources Loan & Financial Programs Essential Businesses Revenue Recovery Consultation & Advising Gig Workers CARES Act	Agency The Office of Economic Development or (GO-Biz) Director: Governor Newsom's Chief Economic & Business Advisor, Lenny Mendonca	2GO-Biz serves as the State of California's leader for job growth and economic development efforts.	The Governor's Office of Business and Economic Development (GO-Biz) has compiled helpful information for employers, employees, and all Californians as it relates to the Coronavirus (COVID-19) pandemic. For a complete list of resources, please visit: https://covid19.ca.gov/ The EDD provides a variety of support services to people who have lost their jobs or have had their hours reduced due to the impacts of COVID-19 in California. For faster and more convenient access to those services, we encourage the use of our online options .	Resources are available throughout California for small businesses impacted by COVID-19. Key Questions: Website Is my business considered essential or nonessential? My business is not classified as essential. What should I do? My business offers a product or service that can help during this crisis. Who should I contact? State Practical Resources: The Office of Small Business Advocate (OSBA): Technical Assistance Provides answers to a list of frequently asked questions to help California's small businesses Constituents can talk to a specialist in GOBiz's Office of the Small Business Advocate directly CA Infrastructure and Economic Development Bank (IBank) Finance Programs (1-750 employees) Disaster Relief Loan Guarantee Program: This disaster program provides loan guarantees of up to \$1 million for small

¹ All financial assistance given to employers and workers alike will need to be paid back as of now. The only thing States are waiving, are certain penalties.

² GO-Biz offers a range of services to business owners including: permit streamlining, clearing of regulatory hurdles, small business assistance, assistance with state government, and much more.



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Small Business Administration (SBA)	The Office of Economic Development or (GO-Biz)			 business borrowers in declared disaster areas. Jump Start Loan Program: This program offers loans from \$500 to \$10,000 to low-wealth entrepreneurs in declared disaster and emergency areas. To contact IBank: Call: 1-916-341-6600

^{• 3} SBA loans are available to the entire state of California.



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	The Office of Economic Development or (GO-Biz)			increases the duration of those payments and extends jobless benefits to previously ineligible groups of workers, like gig workers and freelancers. • The CARES Act will and provide relief for small businesses: • A \$350 billion forgivable loan program designed to ensure that small businesses do not lay off employees • A 50% refundable payroll tax credit on worker wages will further incentivize businesses, including ones with fewer than 500 employees, to retain workers • Looser net operating loss-reduction rules that will allow businesses to offset more • A delay in employer-side payroll taxes for Social Security until 2021 and 2022 • Sole proprietors and other self-employed workers could be eligible for the expanded unemployment-insurance benefits the bill provides Note: Loan Principal Forgiveness Businesses can receive loans up to \$10 million, based on how much the company paid its employees between Jan. 1 and Feb. 29. The loans will carry an interest rate up to 4%. The bill provides for an expedited origination process.



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	The Office of Economic Development or (GO-Biz)			If the business uses the loan funds for the approved purposes and maintains the average size of its full-time workforce based on when it received the loan, <i>the principal of the loan will be forgiven</i> , meaning the company will only need to pay back the interest accrued.
Governor Executive Order	The Employment	The Employment Development Department (EDD)	The EDD provides a variety of support services to people who have lost their jobs or have had their hours reduced due to the impacts of COVID-19 in	What is EDD doing differently to meet unprecedented demand of processing claims?
State Payroll Tax: Extension (60 Days)	Development Department (EDD)	provides a variety of services to businesses, workers, and job seekers.	California For a complete list of resources, please visit: https://edd.ca.gov/about_edd/coronavirus-2019.htm	EDD adjusted eligibility requirements and is exercising flexibility to automatically process a large number of unemployment claims through its system.
Unemployment Benefits	Director: Sharon Hilliard Unemployment	The EDD administers Unemployment Insurance (UI), Disability Insurance (DI), and Paid Family Leave (PFL) programs		It also implemented the following tactics to streamline claim processing: • Staffing claims processing around the clock • Redirecting hundreds of staff from
Children/Family: Wage Loss	Insurance: Greg Williams Taxes:	Loave (i i L) programo		across the department and state government, including some recent retirees with unemployment processing experience
Self-Employed Wage Reduction	Lisa Wheeler			Hiring more staff when possible.
Employment Insurance Programs				State Practical Resources: An employer facing business challenges that affect its workforce might consider: Governor Newsom's executive order
AB 5				temporarily suspends the 60-day notice requirement for employers who give written notice to employees and meet other requirements. O You can request up to a 60-day
				extension to file your state



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CARES Act: Federal Stimulus	The Employment Development Department (EDD)			payroll reports and deposit state payroll taxes without penalty or interest. Your request must be received within 60 days from the original past-due date of the payment or return. • If you are experiencing a slowdown in your businesses or services as a result of the coronavirus impact on the economy, you can apply for the UI Work Sharing Program. • If you are planning a closure or major layoffs as a result of the coronavirus, you can get help through the Rapid Response program. A worker facing unemployment might consider: • If you're unable to work due to having or being exposed to COVID-19 (certified by a medical professional), you can file a Disability Insurance (DI) claim. • DI provides short-term benefit payments to eligible workers who have a full or partial loss of wages due to a non-work-related illness, injury, or pregnancy. Benefit amounts are approximately 60-70 percent of wages (depending on income) and range from \$50-\$1,300 a week. • The Governor's Executive Order waives the one-week unpaid waiting period, so you can collect



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	The Employment Development Department (EDD)			DI benefits for the first week you are out of work. If you're unable to work because you are caring for an ill or quarantined family member with COVID-19 (certified by a medical professional), you can file a Paid Family Leave (PFL) claim. PFL provides up to six weeks of benefit payments to eligible workers who have a full or partial loss of wages because they need time off work to care for a seriously ill family member or to bond with a new child. Benefit amounts are approximately 60-70 percent of wages (depending on income) and range from \$50-\$1,300 a week. The Governor's Executive Order waives the one-week unpaid waiting period, so you can collect UI benefits for the first week you are out of work. If your employer has reduced your hours or shut down operations due to COVID-19, you can file an Unemployment Insurance (UI) claim. If your child's school is closed, and you have to miss work to be there for them, you may be eligible for Unemployment Insurance benefits. If you are self-employed, you may have benefits available from EDD employment insurance programs that you or your



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Reference	The Employment Development Department (EDD)	& Notes	COVID-19	employer may have paid into over the past 5 to 18 months You may have contributions from a prior job, or you could have been misclassified as an independent contractor instead of an employee. Apply for the benefit program that best fits your situation and include details about your employment to help us process your claim. 45AB 5: Independent Contractor Compliance The EDD has created payroll tax-related resources and is preparing payroll tax seminars to provide guidance for employers. The U.S. Department of Labor is expected to publish guidelines soon for states to expand benefits to include the gig economy and what workers will need to apply, CNBC reports. Federal Resources: The CARES Act: Coronavirus Aid, Relief, and Economic Security Act The hallmark of the \$2 trillion stimulus package were one-time \$1,200 direct payments to adults making up to \$75,000. The stimulus package will pay workers \$600 a week on top of whatever sum they

⁴ Special Note: The provisions of AB 5 are still necessitated during this pandemic.

⁵ Michigan Gov. Gretchen Whitmer already expanded benefits in her state to include contract workers, WWMT reports. President Donald Trump signed the stimulus package into law Friday, so it's unclear just how many other states have signed up for the added benefits for gig workers so far.



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	The Employment Development Department (EDD)			receive in their state-level unemployment claim for a period of up to four months. • fincludes unemployment benefits for independent contractors, gig workers and the self-employed.
Governor's Coordinated work force programs Central Hub Labor Worker Support Services	The Labor & Workforce Agency (LWDA) Secretary, Julie A. Su	⁷ The California Labor and Workforce Development Agency (LWDA) is the first cabinet-level agency to coordinate workforce programs.	"In the face of the COVID-19, the Labor & Workforce Development Agency (LWDA) wants to keep workers, employers, co-workers, and families safe. What employees are entitled to may be confusing. We are trying to make it easier and spread awareness through by providing a centralized source of info: https://www.labor.ca.gov/coronavirus2019/	State Practical Resources: Employees: Support Services for Workers Rights and Protections for Worker Interim Guidance for Protecting Health Care Workers Employers: Reduced Work Hours, Potential Closure or Layoffs, and Tax Assistance Guidance on Requirements to Protect Workers from Coronavirus Educational Materials and Fact Sheets

⁶ Under the Pandemic Unemployment Assistance, included in the stimulus bill, freelancers and gig workers can receive half the average unemployment benefit in their state and an extra \$600 per week. The new assistance program was created to help qualify self-employed workers who couldn't file for regular unemployment insurance.

⁷ The Agency oversees seven major departments, boards and panels that serve California workers and businesses



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Federal Protection	8The Equal Employment Opportunity	Federal and state law prohibit California employers from	The EEOC has provided guidance (a publication entitled ⁹ Pandemic Preparedness in the Workplace and the Americans With Disabilities Act, consistent	Response from Governor Newsom: California's Gov. Gavin Newsom ended his Thursday press conference with an
Discrimination	Commission (EEOC)	discriminating against employees based on certain characteristics, such	with these workplace protections and rules that can help employers implement strategies to navigate the impact of COVID-19 in the workplace.	acknowledgement of the growing number of attacks on Asian Americans. He said that he came from an area in the state
Employers	(LLOO)	as race or religion.	https://www.dfeh.ca.gov/	where "anti-Chinese bigotry led to the Chinese Exclusion Act, a black eye in the history of the
Employee Protection Legislative				United States of America" One thing I also want to express: The deep, deep recognition of the xenophobia, racism being perpetuated against Asians in our state. We've seen a huge increase of people
Response & Letter			10California Department of Fair Employment and Housing - Los Angeles (FEPA) 320 West 4th Street, 10th Floor Los Angeles, CA 90013 (800) 884-1684 Website: http://dfeh.ca.gov/Offices.htm	assaulting people on the basis of where they were born and how they look. "We're better than that. We're watching (for) that and we're going to enforce that more aggressively. I hope that people put down their bigotry, their bias. In a state where 27% of us are foreign born, a state that is truly universal, the most diverse state, the world's most diverse democracy, that in order to meet this moment, we have to recognize our common humanity."
				Response from CA API Caucus:

⁸ Non State Agency; Federal Agency

⁹ This pandemic publication, which was written during the prior H1N1 outbreak, is still relevant today and identifies established ADA and Rehabilitation Act principles to answer questions frequently asked about the workplace during a pandemic. It has been updated as of March 19, 2020 to address examples and information regarding COVID-19.

¹⁰ The EEOC works with the Fair Employment Practice Agencies (FEPAs) and the Tribal Employment Rights Offices (TEROs) to manage charges of discrimination and the protection of the employment rights of Native Americans. The EEOC contracts with approximately 90 FEPAs nationwide to process more than 48,000 discrimination charges annually. These charges raise claims under state and local laws prohibiting employment discrimination as well as the federal laws enforced by the EEOC.



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				Assemblymember David Chiu (D-San Francisco), chair of the Asian Pacific Islander Legislative Caucus, wrote to Gov. Gavin Newsom on March 17, seeking action in response to attacks on Asian Americans in connection with the coronavirus crisis.
Grant Administration Invoice Processing Fuel & Transportation Agreement	The California Energy Commission (CEC) Executive Director, Richard Morgan	As the state's primary energy policy and planning agency, the Energy Commission plays a critical role in creating the energy system of the future - one that is clean, is modern, and ensures the fifth largest economy in the world continues to thrive. The Commission is a division of the California Natural Resources Agency	"Internally, we are quickly implementing processes to minimize disruptions to the Energy Commission's workflow. Our focus is to ensure business continuity at the Energy Commission, including grant administration and invoice processing." If you have questions or concerns regarding any projects that you are working on with CEC staff, please reach out to the assigned staff Director of Governmental Affairs - Barry Steinhart - 916-654-4942 • Legislative Assistant - Gretchen Kocinsky - 916-654-4942 • Legislative Manager - Richard Rojas - 916-654-4992 • Legislative Analyst - Colin Hendricks Small Business/Disabled Veteran Business Enterprise Advocate - DVBE 916-654-0588 advocate@energy.ca.gov	State Practical Resources: If you need help identifying the appropriate staff to contact, our Public Advisor, Noemi Gallardo, is available to assist at publicadvisor@energy.ca.gov. Grant administration or invoice processing please contact your Contract Agreement Manager. For additional assistance with Energy Research and Development agreements, please contact Doris Yamamoto at Doris.Yamamoto@energy.ca.gov. For additional assistance with Fuels and Transportation agreements, please contact Spencer Kelley at Spencer.Kelley@energy.ca.gov Grants Ombudsman, Jennifer Martin-Gallardo, at Jennifer.Martin-Gallardo@energy.ca.gov.



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California's Nonprofits Business Interruption Policies Non Profit Insurance Reimbursement Legislative Letter	¹¹ CalNonprofits	121314The California Association of Nonprofits (CalNonprofits) is a statewide membership organization that brings nonprofits together to advocate for the communities we serve.		Resources/Updates: Letter to Congress: America's charities request \$60 billion infusion of support to help the most vulnerable (with the National Council of Nonprofits) The letter asks for public contracts with nonprofits to be honored even if non-performance is inevitable due to the disruptions caused by the virus, to make emergency funds available for nonprofits to maintain their operations and to extend protections from utility shutoffs and evictions to nonprofit organizations. Letter to Governor: 955 California not for profit organizations wrote to Governor Newsom and the California Legislature asking the state to support California's nonprofits through the emergency public health situation brought about by COVID-19. Relief from government contract deliverables that cannot be met due to new regulation Ability to modify contracts with government

¹¹ Non State Agency

¹² California's has an estimated 80,000 nonprofits.

¹³ Government relies on nonprofits to provide 32 percent of Medi-Cal Services.

¹⁴ California nonprofits rely on government funding for 30 percent of the sector's total revenue.



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	CalNonprofits			 Equal treatment for nonprofits in support for employers and employees Funds marked for nonprofit expenses as we go all out fighting the pandemic On March 19, the President signed into law, H.R. 6201, the Families First Coronavirus Response Act. The bill includes a complex set of temporary paid leave mandates and employer reimbursement provisions, as well as funding for free coronavirus testing, food nutrition security, and Unemployment extension. Does My Policy Cover A Loss Caused by Coronavirus (COVID-19). Information on the website includes the following: Property Insurance General Liability Insurance Workers' Compensation Many nonprofits are worried about their loss of income or revenue if they have to shut down due to an outbreak of COVID-19 in their facility, especially those that serve large populations of people such as schools or food banks. Fund Your Nonprofit Loss Control Project! The Gilbert Fund assists our nonprofit members with reimbursement for small risk management projects. The maximum reimbursement is \$500 annually and all NIA



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ROTEREVICE	CalNonprofits	& NOTES		members are eligible. It's easy to apply by completing the web form. • Eligible Loss Control and Risk Management Projects example: • Emergency telecommuting/remote employees, essential operational needs



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State Tax Relief Personal Income Tax	The California State Franchise Tax Board (FTB)The	¹⁵ FTB administers two of California's major tax programs: Personal Income Tax and the Corporation Tax. FTB also administers other non-tax programs and		In line with Governor Newsom's March 12 Executive Order, FTB previously extended the due dates for filing and payment last week for affected taxpayers until June 15, with the qualification that the deadlines may be extended further if the IRS grants a longer relief period, as
Corporate Income Tax Extended Deadline		delinquent debt collection functions, including delinquent vehicle registration debt collections on behalf of the Department of Motor Vehicles, and court—ordered debt.		it did yesterday. This announcement supersedes last week's announcement. This includes: • 2019 tax returns • 2019 tax return payments • 2020 1st and 2nd quarter estimate payments • 2020 LLC taxes and fees • 2020 Non-wage withholding payments Common Questions:
				 What business entities qualify for the July 15, 2020, extended deadline to file and pay taxes? How does FTB define who is "affected by the COVID-19 pandemic"? How would they need to demonstrate this? Will my scheduled payment automatically be rescheduled to the tax deadline? How do I postpone my scheduled estimated tax payments to the new tax deadline? Can I visit one of your Field Office Public Counters to make a payment or for tax help?

 $^{^{15}}$ Annually, FTB's tax programs collect more than 70 percent of the state's general fund.

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				During the COVID-19 pandemic, will FTB still require taxpayers and/or tax representatives to provide statute of limitations waivers containing original signatures?
Property Tax	¹⁷ The California	1920Comprised of the Treasurer/Tax Collectors in	Tax Collectors have the authority to handle specific scenarios where a taxpayer cannot physically pay	Note: While the April 10 deadline for paying the
Residential Real Property	Association of County Treasurers and	the 58 counties throughout California with associate memberships for financial	their taxes on April 10 due to quarantine, illness or closure of the Tax Collector's office as a result of COVID-19.	second installment of property taxes levied for the 2019-2020 fiscal year currently remains unchanged, penalties and other charges
Taxation Code	Tax Collectors (CACTTC) ¹⁸	service firms, the association provides opportunities for education,	In such cases, the Tax Collector will utilize their authority pursuant to Revenue and Taxation Code	resulting from late payments due to the COVID- 19 crisis may be waived.
No Extension: April 10 th	,	networking and advocacy.	(RTC) 4985.2. to waive interest or penalties that would otherwise be imposed or collected with respect to a delinquent second installment of property taxes levied for the 2019-2020 fiscal year on residential real property.	Further, on March 20, California Assemblymembers Philip Ting and Autumn Burke issued a letter urging tax collectors to apply these penalty waivers "consistently and generously across counties to maximize relief during this emergency." Ting and Burke also

¹⁷ The Los Angeles County Treasurer-Tax Collector's Office, located in Los Angeles, California is responsible for financial transactions, including issuing Los Angeles County tax bills, collecting personal and real property tax payments. The Los Angeles County Treasurer and Tax Collector's Office is part of the Los Angeles County Finance Department that encompasses all financial functions of the local government.

You may contact the Los Angeles County Treasurer-Tax Collector's Office for questions about:

- Property records requests for Los Angeles County, CA
- Looking up property owners by name and address
- Los Angeles County property tax bills and payments
- Property tax rates
- Tax sales in Los Angeles County, California

¹⁸ Non-State Agency; Government Sector Lobbying Association

¹⁹ Previous to that year, there were two Associations: the California Association of County Tax Collectors and the California Association of County Treasurers.

²⁰ If a large portion of taxpayers don't pay on April 10, there could be almost immediate and very serious impacts to school obligations and other local financial obligations that are funded through the payment of property taxes.



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16County of Los Angeles Legislative Letter	The California Association of County Treasurers and Tax Collectors (CACTTC)			stated that they "plan [] to advance emergency legislation as soon as practicable to codify this direction and retroactively waive interest and penalties for homeowners and other taxpayers adversely impacted by this pandemic." Industry groups may also approach the California Legislature to request some form of disaster relief. There may be an update on these efforts sometime in April as the California Legislature is currently in joint recess but scheduled to reconvene on April 13. Businesses are required to file an annual Business Property Statement (Form 571-L) if their aggregate cost of business personal property exceeds \$100,000, or if the assessor requests the information. A penalty applies if the statement is not received by May 7. While this filing deadline currently remains unchanged, there is an effort by industry groups to extend the deadline.

Property taxes in the county of Los Angeles are still due on April 10, but late fees could be waived on a case-by-case basis if someone is unable to pay on time due to unemployment or illness brought forth by the coronavirus.

¹⁶ Property Tax: County of Los Angeles

[&]quot;We have no authority to extend the April 10 deadline, as outlined by state law," Treasurer and Tax Collector Keith Knox said in a statement. "However, beginning on April 11, the day after property taxes are due, people unable to pay on time for reasons related to COVID-19 may submit a request for penalty cancellation online."



Topic of Reference 21Undocumented Workers Labor Laws Employee Assistance	State Agency California Labor Federation ²² President, Kathryn Lybarger	Description & Notes The California Labor Federation is dedicated to promoting and defending the interests of working people and their families for the betterment of California's communities.	Agencies Response to COVID-19 The Coronavirus outbreak has us all on edge. As the crisis grows, California's unions are responding to ensure workers are protected.	Specific Resources & Important Notes Website Resources: Support Services for Workers Relief Funds for Undocumented Workers Executive Orders COVID-19 Guidance for K-12 Schools Union Resources on COVID-19 Central Labor Council Resources
Central Hub Undocumented Workers Financial Relief	²³ Legal Aid at Work		To assist undocumented workers who have lost their jobs or income as a result of the Coronavirus outbreak, Legal Aid at Work has compiled a list of known relief funds for undocumented workers. https://legalaidatwork.org/factsheet/undocumented-workers-employment-rights/	 Food Banks Federal Resources As an undocumented worker, what are my rights under wage and hour laws? As an undocumented worker, can I receive workers' compensation benefits? As an undocumented worker, what are my rights under health and safety laws? As an undocumented worker, can I collect unemployment insurance? As an undocumented worker, can I collect State Disability Insurance? Do anti-discrimination laws protect undocumented workers? For a list of Financial Resources: https://legalaidatwork.org/blog/relief-funds/

²¹ California's labor force includes about 1.75 million undocumented immigrants, according to the PRC. This is the second-highest statewide concentration of undocumented workers (9.0%) in the US after Nevada (10.4%). Undocumented immigrants work disproportionately in agriculture, construction, and manufacturing

²² Non- State Agency

²³ Non- State Agency



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	Legal Aid at Work			The list will be updated on a weekly basis. If you know of a relief fund that is open to undocumented workers affected by the COVID-19 pandemic, please email the information to relief@legalaidatwork.org.
Government Contracts	The Department of General Services (DGS) Director, Daniel C. Kim	The Department of General Services (DGS) serves as business manager for the state of California.	For questions related to this guidance, contact the department's assigned Purchasing Authority Specialist or PAMS@dgs.ca.gov	 Notes: EMERGENCY PURCHASING GUIDANCE FOR DEPARTMENTS Contractors who seek out state and local opportunities are more likely to have a positive impact in responding to COVID-19. As more federal and state funds become available and coronavirus response needs become more defined, the measures listed above may help connect contractors with the federal, state and local customers who On March 4, 2020, the Governor issued a Proclamation of a State of Emergency related to the COVID-19 Coronavirus. As a result of the emergency proclamation, Government Code and Public Contract Code requirements for competitive bidding, advertising and Procurement Division (PD) purchasing authority dollar thresholds have been suspended related to the procurement of goods and services needed to assist in preparing for, containing, responding to, mitigating the effects of and recovering from the spread of COVID-19.

Local Resource Description Notes			
	LocalResource	Description	Notes



Local Assistance Micro- Business	Los Angeles Small Business Emergency Microloan Program	The newly established Small Business Emergency Microloan Program now provides financing needed to strengthen small business enterprises in this time of acute need that have been affected by the COVID- 19 outbreak.'	•	The City's Economic & Workforce Development Department grant loans from \$5K to \$50K to businesses that fit the description of a "micro business".
	Other Local Assistance		•	Small Business Loan Program: The City's Economic & Workforce Development Department grant loans from \$50K to \$500K to small businesses for which bank financing is not available. The processing takes around 2 months Section 108 Major Projects Program: The program is designed to provide gap-financing to major commercial and industrial real estate projects. The major goal of this program is to expand economic opportunities by providing jobs and maintaining or increasing the availability of goods and services for low- and moderate-income residents in the City of Los Angeles. Los Angeles Development Fund (LADF): LADF creates jobs and boosts the economy of low-income communities using the New Markets Tax Credit (NMTC) program by investing in businesses and real estate projects in low-income communities. The LADF reviews projects for possible investment on a rolling basis in accordance with underwriting and project selection criteria approved by the LADF Governing Board. LA Business Portal: Provides you with all the information needed to plan, start, manage and grow your business. It is also updated regularly and includes announcements such as workshops, or initiatives. Business Response Unit: The EWDD's Business Response Unit is available to provide aid to entrepreneurs navigating through the bureaucracy of the City of Los Angeles' departments. This will help people needing assistance to become legally compliant or requiring City resources to conduct business. The Business Response Unit can supply specific contacts throughout various City departments as well as guide individuals and businesses to appropriate outside/referral agencies. The Business Response Unit can



coordinate across multiple departments to resolve delays or other difficulties with City permits, licensing, inspections, and other matters.

- Los Angeles Small Business Commission: Established in 2019, the Los Angeles Small Business Commission (LASBC) is an advisory group that will serve as a liaison between the City and the small business community,\ and as a public forum dedicated to issues affecting entrepreneurs and small business owners. The LASBC also advises the Mayor, City Council and the EWDD on policies promoting small business growth, and evaluates proposed City, State and Federal legislation that may impact small businesses in the City.
- The Jewish Free Loan Association of Los Angeles: Offers interest-free loans on a non-sectarian basis to individuals and families whose needs are urgent and who may not qualify through usual financial channels.