

Mobile County Commission  
American Rescue Plan Act

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# Strategic Spending Plan

AUGUST 2022

# ARRPA



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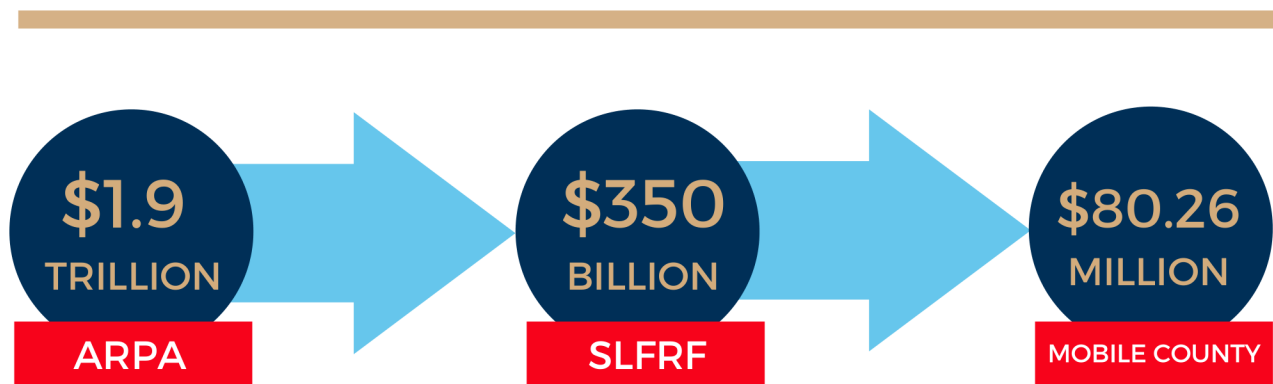
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# OVERVIEW

On March 11, 2021, President Biden signed into law the American Rescue Plan Act (“ARPA”), setting aside a total of \$1.9 trillion in federal funding for COVID-19 related expenses and needs. ARPA specifically designated \$350 billion in funding for states, local and tribal governments under the State and Local Fiscal Recovery Fund (“SLFRF”). Under the SLFRF, Mobile County was allocated a total of \$80.26 million in funding to respond to the negative public health impacts and economic impacts of the COVID-19 pandemic. SLFRF allocations will be disbursed in two tranches: 50% was transferred in May 2021 and the balance will be received approximately 12 months later. SLFRF funds must be incurred and obligated by December 31, 2024, and fully expended by December 31, 2026.

Since federal ARPA funding flows to the local government, Mobile County recognized the importance of establishing a balanced approach for how funds will be allocated and administered so that resources get to where they are needed and projects are effectively implemented. After months of research, community engagement, and dialogue with stakeholders who have a vested interest in the recovery, Mobile County developed a strategic spending plan that will support the community’s immediate response and recovery efforts and will help mitigate any lasting impact that the pandemic may otherwise have had on the County. This plan is a living document and will continue to evolve throughout the period of performance.

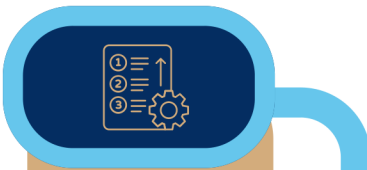


# SPENDING FRAMEWORK

Mobile County Commission's overall goal is to utilize ARRA funds to continue its response to the negative public health effects of the COVID-19 pandemic, while also investing in initiatives that support a strong economic recovery and strengthening fiscal stability by reducing demand on taxpayer dollars. When developing an approach for its ARPA/SLFRF allocation, Mobile County Commission recognized the importance of establishing a framework for investing these funds to generate quantifiable positive outcomes. The developed framework provides a solid foundation for approved expenditures that are in alignment with county priorities, and are eligible under U.S. Treasury's Final Rule and applicable guidance. Specifically, the developed framework for evaluating and approving proposed initiatives to be funded with Mobile County's SLFRF dollars includes the following guideposts:

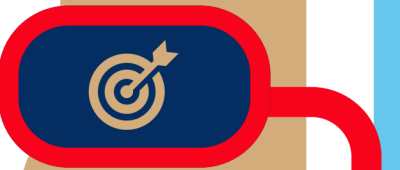
## Understand Priorities

Understand Priorities of Mobile County Commission and the community through public input



## Identify Recovery Goals

Identify Recovery Goals based on community feedback, U.S. Treasury guidance, and County priorities



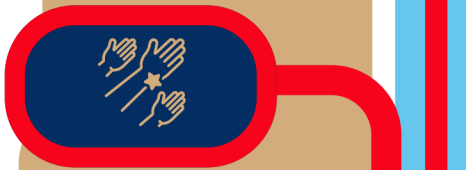
## Identify Vulnerable Populations

Establish a mechanism for identifying the most vulnerable populations



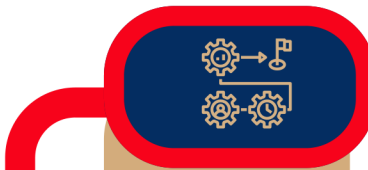
## Public Outreach

Invite and encourage external organizations to apply for funding



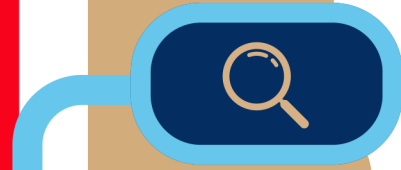
## Spending Strategy

Provide a mechanism for centralized decision making about proposals based on a multi-level, data driven review process that aligns Mobile County's recovery goals with U.S. Treasury's statutory requirements



## Monitor and Compliance

Commit to strong accountability, compliance, and oversight to ensure all dollars are spent effectively and compliantly



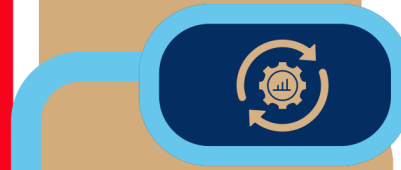
## Report and Closeout

Establish a process for the successful management, monitoring, and evaluation of funds from program start through the distribution of funds and closeout of the approved program



## Flexibility

Establishing a process that allows the County to be able to reallocate funding as needed and as federal guidance evolves



# PUBLIC OUTREACH

On July 30, 2021, as part of implementing the above-outlined framework, Mobile County Commissioners requested public input regarding how they should spend the County's \$80.26 million ARPA allocation. A public engagement website was created that included information and a survey soliciting input. The webpage and comment collector were launched on July 30 and remained open through August 30. The form received 146 responses. The form was promoted on social media and boosted on Facebook twice. It was shared 110 times.

## Mobile County Commissioners Seek Public Input for American Rescue Plan Act Dollars

Posted on: Jul 30th, 2021 | [NEWS AND ANNOUNCEMENTS](#) [PRESS RELEASES](#) [FEATURED NEWS](#)

MOBILE COUNTY, Ala. – Commissioners Merceria Ludgood, Connie Hudson and Randall Dueitt seek public input as they work on a plan for Mobile County's approximately \$80 million American Rescue Plan Act allocation.

146  
Survey  
Responses

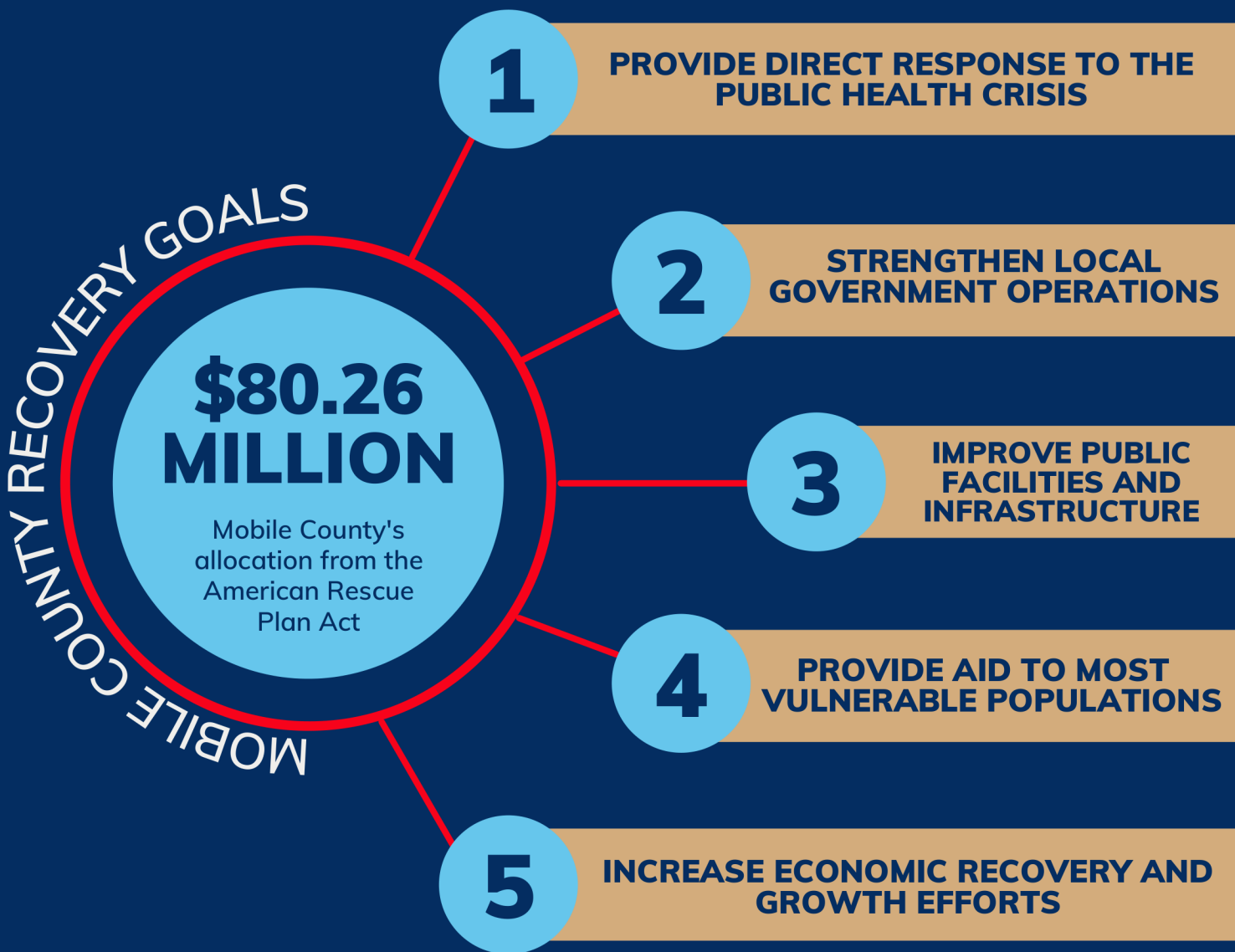
Reached  
21,171  
on Facebook

110  
Facebook  
Shares



# ESTABLISHING RECOVERY GOALS

Following the receipt of public input, five specific recovery goals were identified to address community needs, aid in the immediate response to the COVID-19 pandemic, and invest in long-term growth initiatives that support a strong, resilient, and equitable recovery. Those five goals include:



# SPENDING STRATEGY

This Spending Strategy acts as guidepost for SLFRF investments. It provides the rationale for how to select projects and programs that best align with the goals established to recover from the pandemic. Mobile County Commissioners and staff established a strategy to understand the needs expressed by the community, evaluate, and score each potential project to ensure proper justification of Treasury Guidance as well as alignment of County priorities, which allowed Mobile County Commissioners to better prioritize funding.

When developing the strategy for funding, Mobile County recognized the importance of developing a robust community engagement strategy where agencies, external organizations, and non-profits negatively impacted by the COVID-19 pandemic could request funding for programs and initiatives that would provide necessary relief to those vulnerable populations most affected by the pandemic. Mobile County developed a process where agencies, external organizations, and non-profits could submit proposals for projects to be funded with Mobile County's SLFRF. The proposal process not only evaluated ARPA eligibility and alignment with County priorities, it also included a robust and comprehensive review of applicant operations, processes, resources, and past performances to evaluate the applicant's potential risk of non-compliance.





# SPENDING STRATEGY



# PUBLIC OUTREACH

On September 27, 2021, Mobile County published a news release seeking proposals from agencies, nonprofits organizations, private entities, and local governments for project funding through Mobile County's \$80.26 million ARPA allocation. Mobile County held a public webinar and training to educate external agencies about the online application process and the eligible uses set forth in Treasury's Interim Final Rule. Mobile County's website outlined the details and requirements for submitting requests which included the application and the eligibility memo in both English and Spanish, links to all Treasury guidance, resources should an applicant have questions, and recordings of the public educational webinar. Proposals were accepted from September 27, 2021 to October 25, 2021. Mobile County received nearly 214 applications with funding requests totaling more than four times the county's \$80.26 million allocation.

## Mobile County Commission Seeks Proposals for Coronavirus State and Local Fiscal Recovery Funds

Posted on: Sep 27th, 2021 | [NEWS AND ANNOUNCEMENTS](#) [COVID-19](#) [PRESS RELEASES](#) [FEATURED NEWS](#)

MOBILE COUNTY, Ala. (Sept. 27, 2021) – Commissioners Merceria Ludgood, Connie Hudson and Randall Dueitt seek proposals from agencies, nonprofit organizations, private entities and local governments for project funding through Mobile County's \$80.14 million American Rescue Plan Act allocation.

The deadline for priority consideration of proposal submissions is 5 p.m. Oct. 25, 2021.

This allocation comes from the Coronavirus State and Local Fiscal Recovery Fund. These funds will be used to continue the County's response to the COVID-19 pandemic while investing in initiatives for a strong economic recovery and reducing demand for state taxpayer dollars used for recovery efforts.

200+  
Applications  
Received

>\$133 MM  
Proposed  
Infrastructure  
Projects

Requests  
totalled  
**4X**  
more than  
allocation

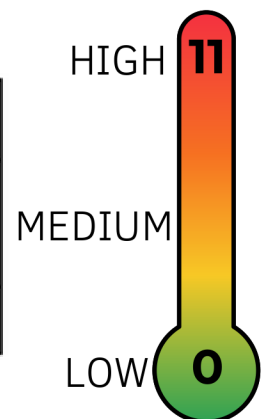


# ELIGIBILITY AND COMPLEXITY RATING

Eligibility assessments were performed on all proposal applications submitted for funding allocations using U.S. Treasury guidance on funding eligibility. Also, Mobile County assigned a complexity rating to each application based on the risks presented by the expense. The complexity rating ranges from 0-11. If a project received a high complexity rating, the potential risks should be evaluated before funding. However, having a high complexity rating does not mean the project is ineligible nor does it indicate the project is not in alignment with County goals. Sample criteria for the complexity rating can be seen below. In addition, proposals were screened to ensure each application was complete, it thoroughly articulated the funding request, and the project service area is within Mobile County.

Sample Scoring Criteria:

Sector Score:	Request \$50k or greater?	Subject to Single Audit?	New Initiative?	Equipment Purchases?	New Construction?	Yr 3 Requests?	New Obligations?
Public	0	1	1	1	2	1	1
Non-Profit	1	0	0	0	0	0	0
Private	3						

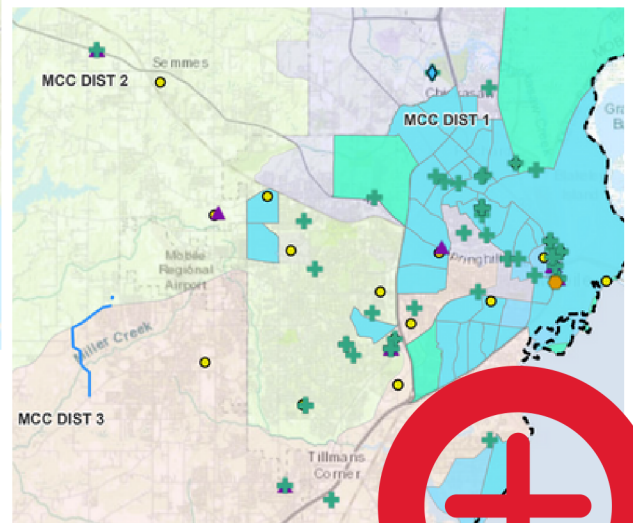
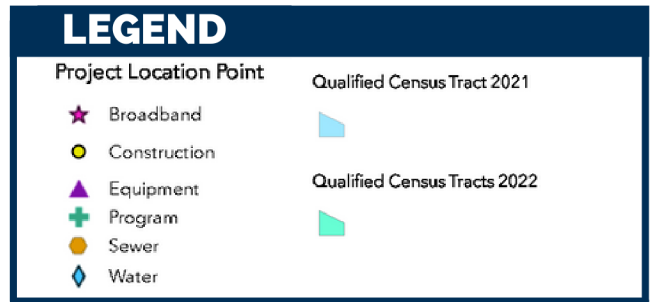
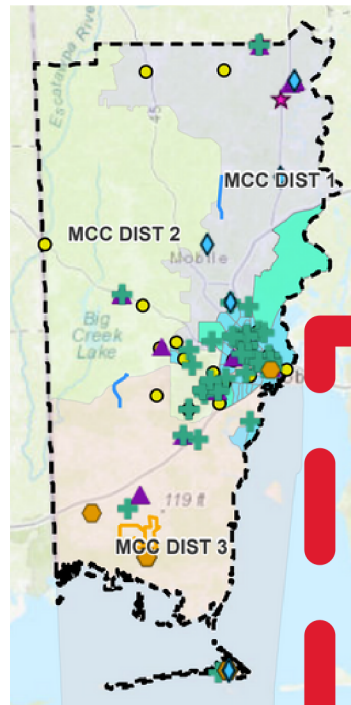


# LOCATION AND EQUITY ASSESSMENT

The U.S. Department of Treasury provides some guidance about what projects are eligible if they are intended to respond to the negative economic impacts of COVID-19. Projects may be presumptively eligible under this criteria if they are delivered in Qualified Census Tracts or are targeted to residents or businesses in these tracts. Mobile County created a district-defined GIS Map with the HUD Qualified Census Tracts (QCT), and plotted each proposed project on that map to help easily identify potential projects that address areas or portions of its population most impacted by the COVID-19 pandemic.

Projects may be eligible even if they are not targeted to a Qualified Census Tract if the County demonstrates they are targeted to groups disproportionately impacted by the pandemic, including by showing pre-pandemic inequalities that were subsequently exacerbated by the COVID-19 pandemic.

Mobile County's multi-step evaluation process examined proposals from multiple vantage points.



# COUNTY REVIEW

Mobile County staff from various departments participated in evaluating and scoring each project using the guiding principles listed below that were adopted by the County Commission to determine the most optimal expenditure of ARPA funds.

## **Tangible Impact:**

Does this project have a large direct benefit to many Mobile County residents or businesses?

## **Long-term Impact:**

Will this project have impacts on the County or residents/businesses that are long term (10+ years) in nature?

## **Community Need:**

Does this project reach a population disproportionately impacted and does it respond to a salient community need?

## **Alignment:**

Is this project clearly aligned to the goals of multiple County strategic plans?

## **Efficiency:**

Is this project impact far greater than the resource expenditure?

## **Transformative Change:**

Would this project be possible without ARPA funds?

## **Sustainability:**

Will this project be sustainable after funding has been spent?



# COMMISSIONER BRIEFING

The application review process included a multi-step, audit ready, data-driven review process to ensure proper justification of U.S. Treasury guidance and alignment to County goals which include promoting equitable outcomes and serving portions of Mobile County's population that were disproportionately impacted by the COVID-19 pandemic.

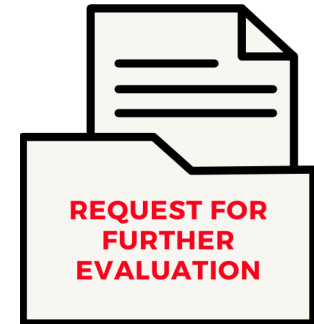
During the review process, Mobile County identified \$362 million worth of eligible funding requests. Of those, \$185 million were determined to be in alignment with the County's ARPA priorities. Multiple meetings were separately held with each Commissioner to review the data collected and to establish a consolidated list of projects that best align with Mobile County's recovery goals. Mobile County Commission selected applicants they wished to fund and bifurcated them into Tier 1 and 2 projects. Those were approved to move into the process' due diligence phase on April 21, 2022.



# SUBRECIPIENT EVALUATION

The U.S. Treasury Department requires that SLFRF recipients evaluate each subrecipients' risk of noncompliance based on a set of common factors. A formal due diligence process was conducted over the Tier 1 and 2 applicants to determine whether they possess the capability to adhere to the guidelines and requirements and have the capacity to manage and implement federal and state regulations, including 2 CFR § 200 and other specific regulations pertaining to items like: segregation of duties, cash handling, contracting procedures, and both personnel and travel policies. Any awardee that is deemed to meet the definition of a beneficiary, as opposed to a subrecipient, will not be required to undergo and comply with rigorous monitoring and reporting requirements set forth by U.S. Treasury.

On April 21, 2022, Mobile County Commission selected 35 of the most advantageous projects to enter a due diligence phase through which where they were further evaluated for eligibility and viability. Furthermore, these assessments enabled Mobile County to identify projects that aligned with the most urgent needs and County spending priorities in an effort to facilitate efficient, prompt economic recovery for Mobile County residents. Discussions were informed by ARPA guidance, program criteria, and Mobile County priorities for recovery. This plan serves merely as a summary to provide insight into the award process so that the public is aware of the process undertaken and awards considered and/or made.



## SUBRECIPIENT RISK ASSESSMENT

- ✓ General Project Review
- ✓ Financial Review
- ✓ Organizational Review
- ✓ Project Budget
- ✓ Project Scope
- ✓ Policy and Procedures

**RECOMMENDED FOR FUNDING**



# FUNDING RECOMMENDATIONS

Treasury's overall goal of SLFRF funds is to continue to support the overall public health response, while also addressing the vast negative economic impacts caused by the COVID-19 pandemic. In addition to the funding required to mitigate for COVID-19-related lost revenue, Mobile County prioritized dedicating its allocation to economic development, health and social services, and affordable housing.

After months of research, community engagement, and dialogue with stakeholders who have a vested interest in the County's recovery, this Strategic Spending Plan was created to balance community investments and government services. Mobile County's Spending Plan outlines the County's priority projects and how the funds are proposed to be spent. This plan is flexible; the County may adjust these projects and award totals as needed. Should a priority project receive other funding, alternative projects that advance the goals of the plan may be selected.

The information herein provides an outline for Mobile County's Strategic Spending Plan categorized by recovery goals.

## TOTAL RECOMMENDED ARPA EXPENDITURES

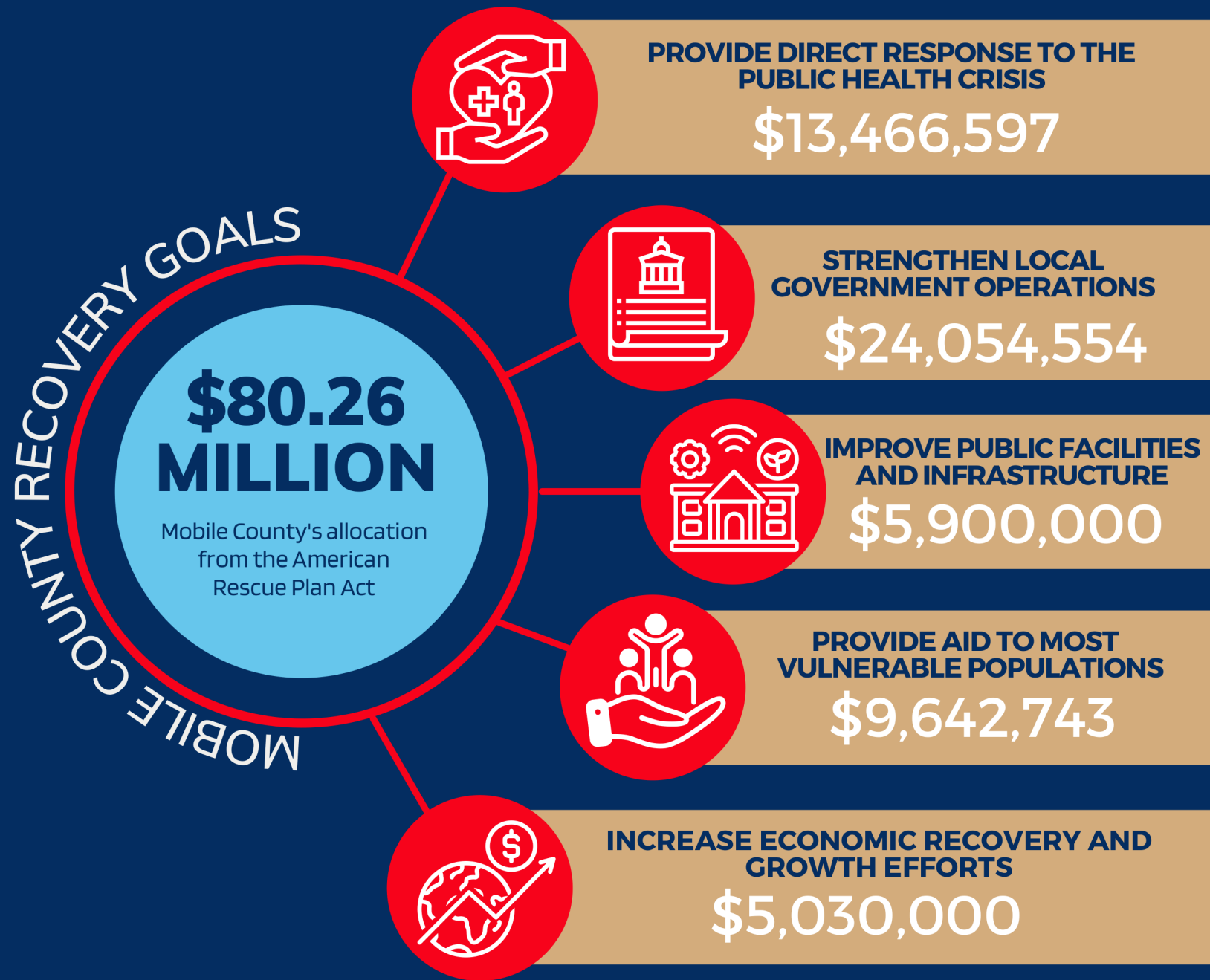
AS OF AUGUST 1, 2022

# \$ 58,093,894





# RECOVERY GOALS



**PROVIDE DIRECT  
RESPONSE TO THE  
PUBLIC HEALTH  
CRISIS**

**\$13,466,597**



**AltaPointe  
Health Systems**  
BayPointe Bed  
Additions

**Mobile  
County EMS**  
Cardiac Arrest  
Units

**Mount  
Vernon  
Senior Center**  
Disability  
Transportation

**Mobile County  
Volunteer Fire  
Department**  
Capacity  
Enhancement

**Veterans  
Recovery  
Resources**  
Renovations:  
Clinically Managed  
Detoxification and  
Residential  
Treatment  
Program

**Mobile  
County  
Government**  
COVID-19  
Expenses



# ALTA POINTE HEALTH SYSTEMS

## BAYPOINTE BED ADDITIONS

### ELIGIBILITY CATEGORY

# 1.12

## Mental Health Services

### PROPOSED FUNDING LEVEL

# \$6,000,000

### PROJECT SUMMARY

The pandemic has created and exacerbated mental health conditions in adults. Currently, there are no inpatient adult psychiatric service providers in the southwest Alabama. Therefore, BayPointe Hospital, which is a free-standing psychiatric hospital in Mobile County, is proposing a project to add 34 adult inpatient beds to serve 1,241 patients annually. Providing these additional beds will improve social distancing at hospital and reduce ER visits for mental health services.

**PROVIDE DIRECT RESPONSE TO  
THE PUBLIC HEALTH CRISIS**



STRATEGIC SPENDING PLAN



# MOBILE COUNTY EMS

## CARDIAC ARREST UNITS

### ELIGIBILITY CATEGORY

# 2.34

Assistance to Impacted Nonprofit Organizations

### PROPOSED FUNDING LEVEL

# \$1,050,000

### PROJECT SUMMARY

The purchase of cardiac monitors for EMS responders will drastically increase the level of care given to patients served. With new monitoring systems, EMS responders will be able to relay a “live view” for doctors that, in turn, advise medics on treatment or transport options. Should local hospitals become overwhelmed again, this technology will be utilized to implement a much-improved telemedicine initiative as well. The purchase of these monitors would serve a population of 204,000 people currently in the emergency response area of the MCEMSSRS.

**PROVIDE DIRECT RESPONSE TO THE PUBLIC HEALTH CRISIS**



STRATEGIC SPENDING PLAN



# MOUNT VERNON SENIOR CENTER

## DISABILITY TRANSPORTATION

### PROPOSED FUNDING LEVEL

**\$252,250**

### PROJECT SUMMARY

Many north Mobile County residents who receive dialysis and other treatments are experiencing difficulties accessing transportation to treatment facilities. Mount Vernon Senior Center is proposing purchasing two disability buses or vans to be able to provide transportation to individuals who need medical transport on a regular basis.

### ELIGIBILITY CATAGORY

**1.14**

Other Public Health  
Services

**PROVIDE DIRECT RESPONSE TO  
THE PUBLIC HEALTH**



STRATEGIC SPENDING PLAN



# MOBILE COUNTY VOLUNTEER FIRE DEPARTMENTS

## CAPACITY ENHANCEMENTS

### ELIGIBILITY CATEGORY

# 2.34

Assistance to Impacted Nonprofit Organizations

### PROPOSED FUNDING LEVEL

# \$1,500,000

### PROJECT SUMMARY

Increasing calls and limited available equipment, lead Mobile County Volunteer Fire Departments to request funds to replenish supplies to adequate levels. Additional training for firefighters and EMTs to maintain social distancing and other health related protocols is also needed.

**PROVIDE DIRECT RESPONSE TO THE PUBLIC HEALTH CRISIS**



STRATEGIC SPENDING PLAN



# VETERANS RECOVERY RESOURCES

## FACILITY RENOVATIONS TO ESTABLISH A CLINICALLY MANAGED DETOXIFICATION AND RESIDENTIAL TREATMENT PROGRAM

### ELIGIBILITY CATEGORY

# 1.13

Substance Use Services

### PROPOSED FUNDING LEVEL

# \$3,800,000

### PROJECT SUMMARY

Veterans Recovery Resources plans to renovate an 18,000-square-foot building in midtown Mobile to house a Clinically Managed Detoxification and Residential Treatment Program. This program would serve the greater Mobile area, since the closest treatment facility for veterans in need is at least a 4-hour drive away. The program would decrease substance abuse disorders, co-occurring conditions, and suicide for Veterans, First Responders, and their families in Mobile County. Included in the project will be 6 beds for clinically monitored detox, 16 beds for residential treatment and 8 beds of supervised housing for veterans transitioning from homelessness and awaiting residential treatment.

PROVIDE DIRECT RESPONSE TO THE PUBLIC HEALTH CRISIS



STRATEGIC SPENDING PLAN



# MOBILE COUNTY GOVERNMENT

## COVID-19 EXPENSES

### PROPOSED FUNDING LEVEL

**\$864,347.14**

### PROJECT SUMMARY

Mobile County Commission previously approved an initial SLFRF allocation for COVID-19 expenses to be utilized to support Mobile County's immediate and ongoing public health response to the COVID-19 pandemic.

### ELIGIBILITY CATAGORY

**1.14**

Other Public Health Services

**PROVIDE DIRECT RESPONSE TO THE PUBLIC HEALTH CRISIS**



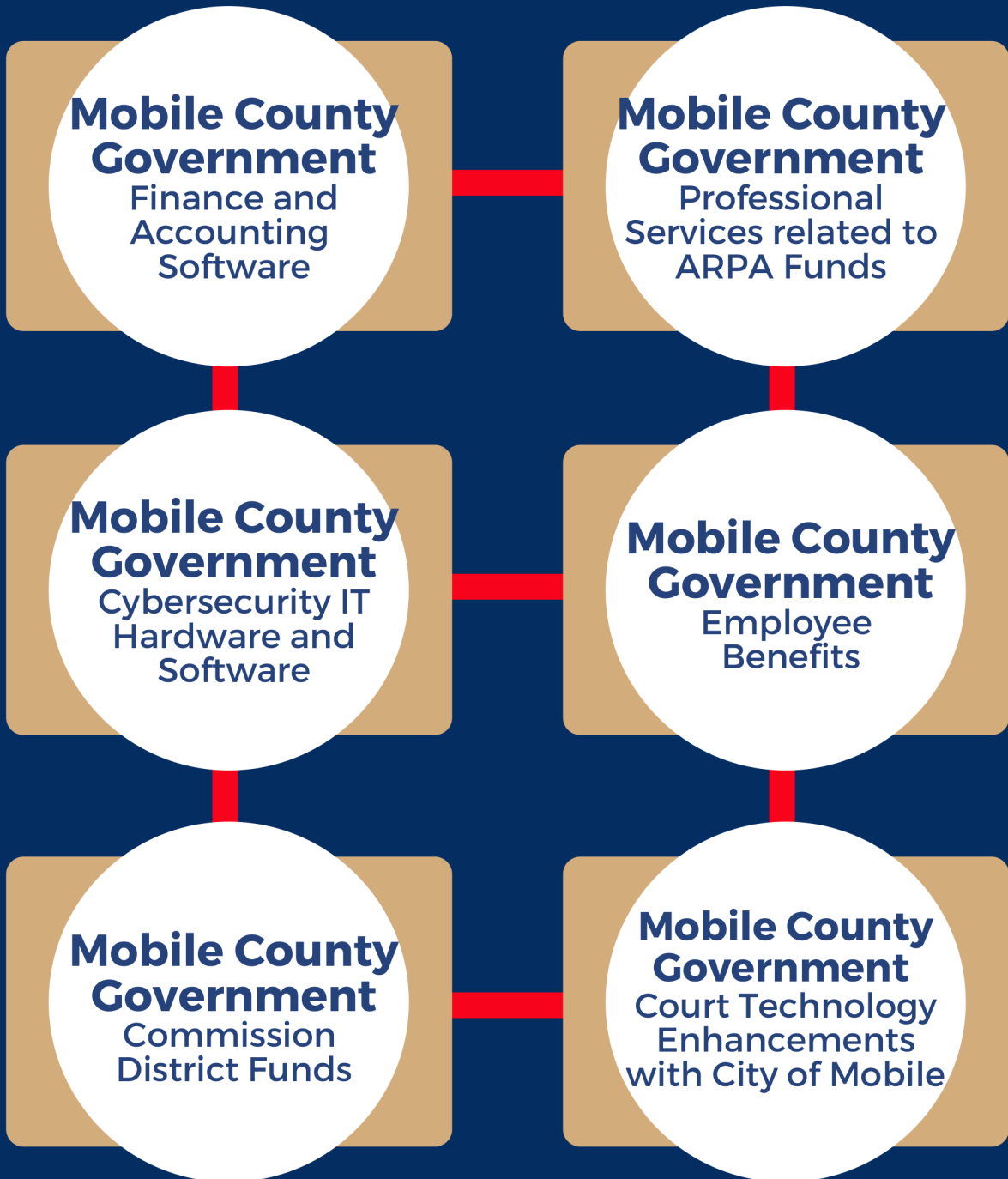
STRATEGIC SPENDING PLAN





# STRENGTHEN LOCAL GOVERNMENT OPERATIONS

## \$24,054,554



# MOBILE COUNTY GOVERNMENT

## FINANCE, ACCOUNTING, AND PAYROLL SOFTWARE

### ELIGIBILITY CATEGORY

# 3.5

Public Sector Capacity:  
Administrative Needs

### PROPOSED FUNDING LEVEL

# \$3,544,632

### PROJECT SUMMARY

Mobile County Commission previously approved funds to purchase the finance, accounting, and payroll software Workday. The implementation of this software provides the technology and infrastructure to facilitate government operations through the pandemic and post-pandemic.

**STRENGTHEN LOCAL GOVERNMENT OPERATIONS**



STRATEGIC SPENDING PLAN



# MOBILE COUNTY GOVERNMENT

## PROFESSIONAL SERVICES RELATED TO ARPA FUNDING

### PROPOSED FUNDING LEVEL

**\$4,013,060**

### PROJECT SUMMARY

Mobile County Commission previously approved funds to contract a consulting firm to support the selection, design, implementation, evaluation, and compliance monitoring of all projects funded by ARPA. These funds are being used for strategy development, program design, execution, compliance, data and impact analysis.

### ELIGIBILITY CATAGORY

**7.1**

**Administrative Expenses**

**STRENGTHEN LOCAL GOVERNMENT OPERATIONS**



STRATEGIC SPENDING PLAN



# MOBILE COUNTY GOVERNMENT

## CYBERSECURITY IT, HARDWARE, AND SOFTWARE

### ELIGIBILITY CATEGORY

# 5.21

Broadband: Other Projects

### PROPOSED FUNDING LEVEL

# \$887,578

### PROJECT SUMMARY

Mobile County Commission previously approved funds to support flexible work by upgrading technology for teleworking, on-site work, as well as to meet Mobile County's IT needs.

**STRENGTHEN LOCAL GOVERNMENT OPERATIONS**



STRATEGIC SPENDING PLAN



# MOBILE COUNTY GOVERNMENT

## EMPLOYEE BENEFITS

### ELIGIBILITY CATEGORY

# 6.1

Provision of Government Services

## PROPOSED FUNDING LEVEL

# \$7,240,000

## PROJECT SUMMARY

Mobile County Commission is spending a portion of its ARPA funds (captured as a portion of Revenue Loss) on two non-recurring benefit spends (#1 in 2021 and #2 in 2022).

**STRENGTHEN LOCAL GOVERNMENT OPERATIONS**



STRATEGIC SPENDING PLAN



# MOBILE COUNTY GOVERNMENT

## COMMISSION DISTRICT FUNDS

### ELIGIBILITY CATEGORY

# 6.1

Provision of Government Services

## PROPOSED FUNDING LEVEL

# \$7,500,000

## PROJECT SUMMARY

Mobile County Commission plans to spend a portion of its ARPA funds (captured as a portion of Revenue Loss) by allocating \$2.5 million to each of the three County Commissioners' District Funds (totaling \$7.5 million). These funds will be spent by each Commissioner how they see fit, staying in line with "provisions of government services" and other eligible uses. Mobile County experienced catastrophic revenue losses in 2021. As a result, spending was cut dramatically, which negatively impacted the County's ability to provide local government services and address the changing impact of COVID-19 on residents and businesses.

**STRENGTHEN LOCAL GOVERNMENT OPERATIONS**



STRATEGIC SPENDING PLAN



# MOBILE COUNTY GOVERNMENT AND THE CITY OF MOBILE

## COURT TECHNOLOGY UPGRADES

### ELIGIBILITY CATEGORY

# 3.4

Public Sector Capacity:

Administrative Needs

### PROPOSED FUNDING LEVEL

# \$869,283.86

### PROJECT SUMMARY

The Mobile County Commission plans to upgrade the technologies within the courtrooms located at the Mobile Government Plaza to address backlog of court cases and for the courtroom to be compliant with CDC COVID-19 guidelines.

The project is for audio, video and information handling upgrades for state courts located at Mobile Government Plaza. The City of Mobile will perform all work and provide half the funds while Mobile County will provide the other half of the funds required for the project.

## STRENGTHEN LOCAL GOVERNMENT OPERATIONS

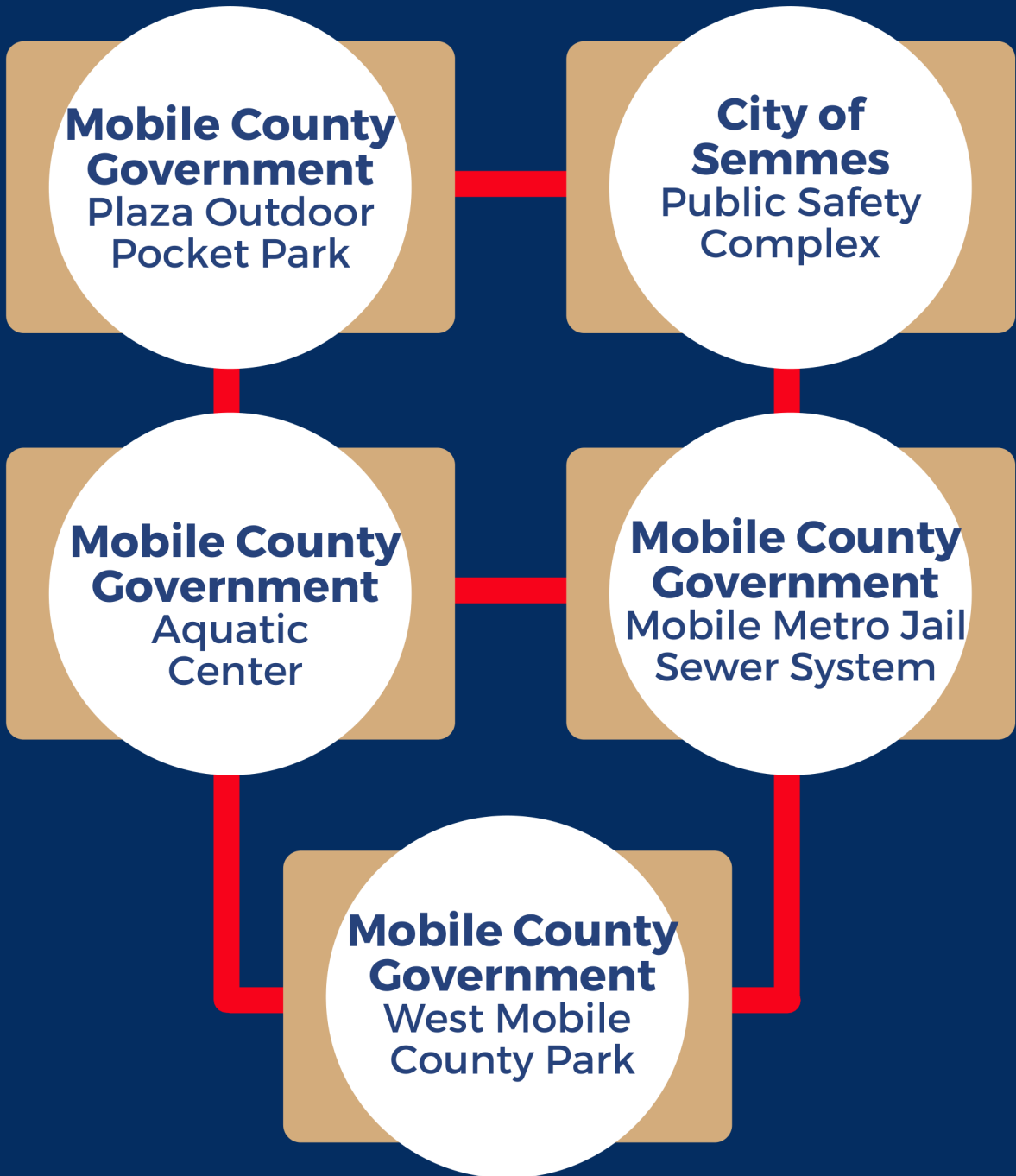


STRATEGIC SPENDING PLAN



# IMPROVE PUBLIC FACILITIES AND INFRASTRUCTURE

## \$5,900,000





# MOBILE GOVERNMENT PLAZA

# OUTDOOR POCKET PARK

## PROPOSED FUNDING LEVEL

**\$800,000**

## PROJECT SUMMARY

The Mobile Government Plaza Pocket Park is an initiative to renovate an existing space adjacent to Government Plaza in downtown Mobile. Government Plaza houses approximately 500 employees and the Mobile County Government Center Annex, which is also immediately adjacent to the park, has approximately 60 employees now and expects an additional 30 employees once the fourth floor renovation is complete in Fall 2022. The transformation of the existing courtyard area would provide outdoor seating areas overlooking two fountains, along with additional shrubs and greenspace. This will create a much needed space for employees and people downtown to partake in socially distanced outdoor lunches, breaks and meetings.

## ELIGIBILITY CATEGORY

**1.4**

Prevention in Congregate Settings (Nursing Homes, Prisons/Jails, Dense Work Sites, Schools, Child care facilities, etc.)

## IMPROVE PUBLIC FACILITIES AND INFRASTRUCTURE



## STRATEGIC SPENDING PLAN



# CITY OF SEMMES

## PUBLIC SAFETY COMPLEX

### PROPOSED FUNDING LEVEL

**\$200,000**

### PROJECT SUMMARY

The purchase of an abandoned retail building will allow creation of a Public Safety Complex. The complex, housing a fire station and police precinct, will provide a much-improved response time to residents in need. The station will serve about 25,000 residents and reduce the stress placed on Mobile County Sheriff's Department with calls related to the COVID-19 Pandemic.

### ELIGIBILITY CATEGORY

**1.7**

Other COVID-19 Public Health Expenses (including Communications, Enforcement, Isolation/Quarantine)

### IMPROVE PUBLIC FACILITIES AND INFRASTRUCTURE



### STRATEGIC SPENDING PLAN



# MOBILE COUNTY GOVERNMENT

## AQUATIC CENTER

### ELIGIBILITY CATEGORY

# 6.1

Provision of Government Services

### PROPOSED FUNDING LEVEL

# \$1,000,000

### PROJECT SUMMARY

Mobile County Commission plans to spend a portion of its ARPA funds (captured as a portion of Revenue Loss) on the development of an aquatic center located at the Mobile County Sportsplex. The Mobile County Aquatic Center project was developed and championed by Commissioner Connie Hudson to provide both improved quality of life and improved sports tourism opportunities for Mobile County. Residents will see quality of life benefit as facilities that provide outdoor recreation support physical and mental wellness in the community. The Aquatic Center will also support a healthier economy as the facility will provide a venue for aquatic sports and tournaments as well as an adventure water park. According to the Outdoor Industry Association, outdoor recreation is the fourth highest-ranking industry by spending sector in the United States that provided \$887B in consumer spending at the national level in 2017. The Mobile County Aquatic Center is designed to provide direct benefits to both community and economic health and well-being.

IMPROVE PUBLIC FACILITIES AND INFRASTRUCTURE



STRATEGIC SPENDING PLAN



# MOBILE COUNTY GOVERNMENT

## MOBILE METRO JAIL SEWER SYSTEM ENHANCEMENTS

### ELIGIBILITY CATEGORY

# 5.18

Water and Sewer:  
Other

### PROPOSED FUNDING LEVEL

# \$900,000

### PROJECT SUMMARY

This initiative will allow the Mobile County Commission to upgrade the Mobile County Metro Jail sewer system. This sewer system upgrade will allow debris to be removed from the sewer waste that is leaving the Metro Jail and causing damage to the local area water treatment equipment. Funds will go towards developing and implementing execution of a project to purchase and install equipment, such as the Rotamat 9, to remove the debris from the sewer system before it leaves the site.

IMPROVE PUBLIC FACILITIES AND INFRASTRUCTURE



STRATEGIC SPENDING PLAN



# MOBILE COUNTY GOVERNMENT

## WEST MOBILE COUNTY PARK

### ELIGIBILITY CATEGORY

# 6.1

Provision of Government Services

### PROPOSED FUNDING LEVEL

# \$3,000,000

### PROJECT SUMMARY

Mobile County Commission plans to spend a portion of its ARPA funds (captured as a portion of Revenue Loss) on renovating an existing playground located at West Mobile County Park. The project may include, but may not be limited to, renovation of the existing playground and construction of a new restroom, splashpad, dog park and two pavilions to include landscaping, irrigation, utilities and all necessary and ancillary equipment.

IMPROVE PUBLIC FACILITIES AND INFRASTRUCTURE



STRATEGIC SPENDING PLAN



# PROVIDE AID TO THE MOST VULNERABLE POPULATIONS

## \$9,642,743



**MOWA Band of Choctaw Indians**  
Emergency Food and Utility Assistance

**RESTORE Mobile**  
Build and Rehab Single Family Affordable Homes

**Sickle Cell Disease Association of America**  
Assistance to Households with Sickle Cell Disease

**Habitat For Humanity**  
Affordable Homes

**Africatown Redevelopment Corporation**  
Historical Preservation and Affordable Housing

**Boys and Girls Club**  
Summer Enrichment Program

**Mobile Community Corrections**  
Inside Out Program

**100 Black Men of Greater Mobile**  
Leadership Program

**Mobile Area Interfaith Conference**  
Academy of Career Development

**Commonwealth National Bank**  
Economic Development Program for small businesses

**Boys and Girls Club**  
Dauphin Island Parkway Facility

**Friends of the African American Heritage Trail**  
Community Revitalization



# MOWA BAND OF CHOCTAW INDIANS

## EMERGENCY FOOD AND UTILITY ASSISTANCE

### ELIGIBILITY CATAGORY

# 2.2

Household Assistance:  
Rent, Mortgage, and  
Utility Aid

### PROPOSED FUNDING LEVEL

# \$300,000

### PROJECT SUMMARY

MOWA Band of Choctaw Indians has more than 7,600 tribal members, many of whom have fallen behind with their utilities and are even struggling with the ability to purchase food since the start of the pandemic. With the assistance of ARPA, MOWA will be able to provide aid with utility and food assistance to the more than 300 members who are at or below the 30% poverty rate.

**PROVIDE AID TO MOST  
VULNERABLE POPULATIONS**



STRATEGIC SPENDING PLAN



# RESTORE MOBILE

**BUILD AND  
REHAB  
SINGLE  
FAMILY  
AFFORDABLE  
HOMES**

## ELIGIBILITY CATAGORY

# 2.15

**Long-term Housing,  
Security: Affordable  
Housing**

## PROPOSED FUNDING LEVEL

# \$1,250,000

## PROJECT SUMMARY

Restore Mobile aims to have seven homes built. Initially, four homes will be built and sold to income-qualified buyers providing long-term housing for buyers in the community. The proceeds from the sales of each of the homes will be used to build an additional three homes. These will then be sold with the same restrictions to income-qualified buyers.

**PROVIDE AID TO MOST  
VULNERABLE POPULATIONS**



STRATEGIC SPENDING PLAN





# SICKLE CELL DISEASE ASSOCIATION OF AMERICA

## FINANCIAL ASSISTANCE TO HOUSEHOLDS WITH SICKLE CELL DISEASE

### ELIGIBILITY CATEGORY

# 2.2

Household Assistance:  
Rent, Mortgage, and  
Utility Aid

### PROPOSED FUNDING LEVEL

# \$223,677.15

### PROJECT SUMMARY

Many residents of Mobile County became disconnected from their medical provider during the pandemic due to the fear of contracting COVID-19 and are suffering severe effects of the virus and/or the lack of resources to pay for their doctor visits and transportation. Sickle Cell Disease Association proposed a program to provide financial assistance to those who have fallen behind on utilities and rent/mortgage payments to allow clients to focus on their health and day- to-day needs

**PROVIDE AID TO MOST VULNERABLE POPULATIONS**



STRATEGIC SPENDING PLAN



# HABITAT FOR HUMANITY

## AFFORDABLE HOMES

### ELIGIBILITY CATEGORY

# 2.15

**Long-term Housing,  
Security: Affordable  
Housing**

### PROPOSED FUNDING LEVEL

# \$645,000

### PROJECT SUMMARY

For decades, stagnant wages combined with insufficient supply to meet demand have pushed the cost of homes out of reach for millions of families. Now, with the extreme effects of COVID-19 on wages and job cuts more individuals are facing housing instability. Keeping this in mind, Habitat for Humanity of Southwest Alabama (HFHSWA) seeks to provide continuous affordable housing for low-income families in the community at the pre-pandemic level. The ARPA funds will allow HFHSWA to continue to provide safe and affordable homes to nine (9) low-income families in the community.

**PROVIDE AID TO MOST  
VULNERABLE POPULATIONS**



STRATEGIC SPENDING PLAN



# AFRICATOWN REDEVELOPMENT CORPORATION

## HISTORIC PRESERVATION AND AFFORDABLE HOUSING

### ELIGIBILITY CATAGORY

# 2.15

Long-term Housing,  
Security: Affordable  
Housing

## PROPOSED FUNDING LEVEL

# \$3,000,000

## PROJECT SUMMARY

The Africatown Redevelopment Corporation aims to preserve history by renovating single family homes. The COVID-19 Pandemic's effect on historic Africatown was detrimental to this community with many low-income families. Africatown Redevelopment Corporation plans to undertake as many restoration projects as funding will allow.

By renovating these homes and preserving history they hope to enable more members of the community to live in affordable housing and enhance the community of Africatown.

**PROVIDE AID TO MOST  
VULNERABLE POPULATIONS**



STRATEGIC SPENDING PLAN



# BOYS AND GIRLS CLUB OF SOUTH ALABAMA

## SUMMER ENRICHMENT PROGRAM

### ELIGIBILITY CATEGORY

# 2.25

Addressing Educational Disparities: Academic, Social, and Emotional Services

### PROPOSED FUNDING LEVEL

# \$660,000

### PROJECT SUMMARY

The disruption and uncertainty caused by the pandemic have exacerbated many negative factors by challenging generations of families throughout Mobile County: inequity in wages, educational opportunities, physical and mental health services; homelessness, and sub-standard housing. The availability of safe, affordable childcare for out-of-school times is also a need. Summer Enrichment Programs will provide safe, structured and affordable childcare for children ages 6 through 14, while parents may continue to work knowing that their children are being well-cared for. BGCSA will provide teaching to those who lost educational foundations and whose social/emotional development was disrupted when schools closed. This program will be at no cost to families, enabling them to direct their income to other life-sustaining necessities.

PROVIDE AID TO MOST VULNERABLE POPULATIONS



STRATEGIC SPENDING PLAN



# MOBILE COMMUNITY CORRECTIONS

## INSIDE OUT PROGRAM

### ELIGIBILITY CATAGORY

# 2.10

Assistance to Unemployed or Unemployed Workers (e.g., job training, subsidized employment, employment support or incentives)

## PROPOSED FUNDING LEVEL

# \$677,217

## PROJECT SUMMARY

Mobile Community Corrections Center has developed a program that provides at-risk individuals the opportunity to exceed their circumstances. Giving unemployed individuals the opportunity to obtain their GED, learn job application skills, interview preparation skills, job training, and group counseling. This program will grant at-risk individuals an opportunity to re-integrate into society, reducing recidivism through focusing on a holistic approach each person in the program. This inside out program will be able to purchase supplies for learning, cover the cost of drug testing, software and tablets for learning, and provide fatherhood initiative materials. The project will also provide basic hygiene supplies to its participants and allot money for referrals to AltaPointe mental care facilities.

**PROVIDE AID TO MOST  
VULNERABLE POPULATIONS**



STRATEGIC SPENDING PLAN



# 100 BLACK MEN OF GREATER MOBILE

## LEADERSHIP PROGRAM

### ELIGIBILITY CATEGORY

# 2.25

Addressing Educational Disparities: Academic, Social, and Emotional Services

### PROPOSED FUNDING LEVEL

# \$750,000

### PROJECT SUMMARY

African American males in public schools consistently lag African American females and white male peers in both school completion and employment rates. African American males are more likely to be inaccurately placed in special education than any other group and African American males are less likely to attend college as compared to African American females and their white male counterparts even if they graduate from high school. Because of this, 100 Black Men of Greater Mobile is proposing a program to initiate a Leadership and Mentoring Academy to assist middle and high school males in developing the essential skills needed to enter the workforce including tutoring, summer enrichment, after-school and other extended learning and enrichment programs and the habits necessary for meaningful and productive lives. This program will seek to focus on 40 to 60 males per school in grades 6-12.

PROVIDE AID TO MOST VULNERABLE POPULATIONS



STRATEGIC SPENDING PLAN



# MOBILE AREA INTERFAITH CONFERENCE

## ACADEMY OF CAREER DEVELOPMENT

### ELIGIBILITY CATEGORY

# 2.10

Assistance to Unemployed or Unemployed Workers (e.g., job training, subsidized employment, employment support or incentives)

### PROPOSED FUNDING LEVEL

# \$180,000

### PROJECT SUMMARY

Mobile Area Interfaith Conference plans to enhance the lives of individuals reentering society from incarcerated backgrounds. The program goal is to increase public safety, reduce recidivism, increase housing stability, and increase employment and financial stability. The program plans to include educational training, vocational training, and employment opportunities for participants. Along with training, the Academy of Career Development Program will provide returning citizens with up to \$1,000 annually to assist them with transportation, work clothes and equipment, education, temporary lodging, and rental/utility assistance.

**PROVIDE AID TO MOST VULNERABLE POPULATIONS**



STRATEGIC SPENDING PLAN



# COMMONWEALTH NATIONAL BANK

## ASSISTANCE WITH ECONOMIC DEVELOPMENT PROGRAMS FOR SMALL BUSINESSES

### ELIGIBILITY CATEGORY

# 2.30

Assistance to Small Businesses: Technical Assistance, Counseling, or Business Planning

## PROPOSED FUNDING LEVEL

# \$1,000,000

## PROJECT SUMMARY

Commonwealth, being one of the last standing African American-owned banks in the country, desires to remain a pillar in the community. For years, Commonwealth National Bank has been the organization many have looked to for continued growth and economic development. These funds will be utilized to help disadvantaged businesses and organizations recover from the Pandemic in the following ways: Secure business tools for production, collaboration, delivery and optimization models to ensure the success rate of disadvantaged organizations. Create a development team for the business owner and entrepreneur with business professionals, consultants, marketing experts, and skilled workers who provide the biggest impact to success for the business owners. Identify potential communities located within Qualified Census Tracts that meet our target demographics, implement marketing activities to maximize program reach. Prioritize the business needs of selected entrepreneurs, determine business fundamentals that need strengthening in preparation for growth, training, mentoring, and coaching. Create an assessment survey to capture feedback to be able to modify program strategy to make sure goals are met.

PROVIDE AID TO MOST VULNERABLE POPULATIONS



STRATEGIC SPENDING PLAN





# BOYS AND GIRLS CLUB OF SOUTH ALABAMA

## DAUPHIN ISLAND PARKWAY FACILITY

### ELIGIBILITY CATEGORY

# 2.25

Addressing Educational Disparities: Academic, Social, and Emotional Services

### PROPOSED FUNDING LEVEL

# \$456,848.88

### PROJECT SUMMARY

The continued disruption and uncertainty caused by the pandemic have only exacerbated the many negative factors that have challenged generations of families throughout Mobile County. Because of this, The Boys & Girls Club of South Alabama is proposing a new club that will serve youth ages 6 through 18 to realize their full potential as productive, caring and responsible citizens. The club will be a safe, nurturing environment where kids can learn and grow with all activities designed to lead to academic success, healthy lifestyles and good citizenship.

**PROVIDE AID TO MOST VULNERABLE POPULATIONS**



STRATEGIC SPENDING PLAN



# FRIENDS OF THE AFRICAN AMERICAN HERITAGE TRAIL

## COMMUNITY REVITALIZATION

### PROPOSED FUNDING LEVEL

\$500,000

### PROJECT SUMMARY

The African American Heritage Trail is enriched with culture rooted deep within the Mobile community. The purchase of a large tour bus will increase the capacity of its tour program, allowing more individuals to be educated on Mobile's African American heritage. Purchasing QR codes to place on historical markers will make information more accessible to visitors and in hopes, reduce the potential spread of COVID-19 by reducing physical touch to historical markers and increasing social distancing. Hiring a tour coordinator will also enhance the tour experience by having someone who is trained and knowledgeable on the facts of the African American History in the Mobile area.

### ELIGIBILITY CATAGORY

2.35

Aid to Tourism, Travel, or Hospitality

PROVIDE AID TO MOST VULNERABLE POPULATIONS



STRATEGIC SPENDING PLAN



# INCREASE ECONOMIC RECOVERY AND GROWTH EFFORTS

# \$5,030,000



## USS Battleship Memorial Park

Teak Deck Replacement

## Mobile Sports Authority

Portable Basketball and Volleyball Courts

## Mobile County Government

Master Plan for the Civil Rights and Cultural Heritage Districts



# USS BATTLESHIP MEMORIAL PARK

## TEAK DECK REPLACEMENT

### ELIGIBILITY CATEGORY

# 2.35

Aid to Tourism, Travel,  
or Hospitality

### PROPOSED FUNDING LEVEL

# \$1,000,000

### PROJECT SUMMARY

The USS ALABAMA Battleship Commission plans to replace 22,000 square feet of the original teak deck. This project will allow the 56-year established center of tourism travel and hospitality to enhance its place in the tourism sector of Mobile that was greatly impacted by the COVID-19 pandemic. The replacement of the 79-year-old teak deck will allow an estimated 400,000 visitors to continue to walk the main deck of the USS ALABAMA annually.

**INCREASE ECONOMIC RECOVERY  
AND GROWTH EFFORTS**



STRATEGIC SPENDING PLAN



# MOBILE SPORTS AUTHORITY

## PORTABLE BASKETBALL AND VOLLEYBALL COURTS

### ELIGIBILITY CATEGORY

# 2.35

Aid to Tourism, Travel,  
or Hospitality

### PROPOSED FUNDING LEVEL

# \$530,000

### PROJECT SUMMARY

The Mobile Sports Authority's mission as the sports tourism agency for the City and County of Mobile is to attract, support, host, and manage sporting competitions, which brings a positive economic and public relations impact to the Mobile area. These courts would greatly increase the number of tournaments hosted in Mobile annually, and hence, attract more tourism income to the area. In FY2020 (Oct 1, 2019-Sept 30, 2020), the estimated economic impact generated in Mobile County from MSA events was only \$7.6 million due to COVID-19.

That impact was DOWN sharply from an estimated \$22.3 million in FY2019. These courts and the marketing/expenses/bid fees funding requests would help to cover the losses in 2020 by greatly increasing the number of sports events hosted in Mobile County over the next four years.

**INCREASE ECONOMIC RECOVERY  
AND GROWTH EFFORTS**



STRATEGIC SPENDING PLAN



# MOBILE COUNTY GOVERNMENT

## MASTER PLAN FOR CIVIL RIGHTS AND CULTURAL HERITAGE DISTRICTS

### ELIGIBILITY CATEGORY

**2.29-2.33**

Support for small businesses

**2.35**

Aid to Tourism, Travel, or Hospitality

### PROPOSED FUNDING LEVEL

**\$3,500,000**

### PROJECT SUMMARY

Mobile County Government proposes to develop and execute a Master Plan for Mobile County Civil Rights and Cultural Heritage Districts, including Isom Clemon Civil Rights Park construction, establish a revolving loan fund to spur small businesses to support the district and fund facade improvements in neighboring properties. This project will elevate Mobile's Civil Rights and Cultural Heritage to create another tourism asset. It will encompass Qualified Census Tracts, promote small business development, and neighborhood revitalization.

**INCREASE ECONOMIC RECOVERY AND GROWTH EFFORTS**



STRATEGIC SPENDING PLAN



# PROPOSED SPENDING PLAN

As of August 1, 2022

Public Health		
AtlaPointe Health Systems	BayPointe Bed Additions	\$ 6,000,000.00
Mount Vernon Senior Center	Disability Transportation	\$ 252,250.00
Veterans Recovery Resources	Renovation for a Clinically Managed Detoxification and Residential Treatment Program	\$ 3,800,000.00
Mobile County Government	COVID 19 Expenses	\$ 864,347.14
City of Semmes	Public Safety Complex	\$ 200,000.00
Mobile County Government	Plaza Outdoor Pocket Park	\$ 800,000.00
		<b>\$ 11,916,597.14</b>

Negative Economic Impact		
Mobile County EMS	Cardiac Arrest Units	\$ 1,050,000.00
Mobile County Volunteer Fire Department	Capacity Enhancements	\$ 1,500,000.00
MOWA Band of Choctaw Indians	Emergency Food and Utility Assistance	\$ 300,000.00
RESTORE Mobile	Build and Rehab Single Family Affordable Homes	\$ 1,250,000.00
Sickle Cell Disease Association of America Mobile Chapter	Financial Assistance to Households with Sickle Cell Disease	\$ 223,677.15
Habitat for Humanity	Affordable Homes	\$ 645,000.00
Africatown Redevelopment Corporation	Historical Preservation and Affordable Housing	\$ 3,000,000.00
Boys and Girls Club	Summer Enrichment Program	\$ 660,000.00
Mobile Community Corrections	Inside Out Program	\$ 677,217.00
100 Black Men of Greater Mobile	Leadership Program	\$ 750,000.00
Mobile Area Interfaith Conference	Academy of Career Development	\$ 180,000.00
Commonwealth National Bank	Economic Development Program	\$ 1,000,000.00
Friends of the African American Heritage Trail	Community Revitalization	\$ 500,000.00
Boy and Girls Club	New DIP Facility	\$ 456,848.88
USS Battleship Memorial Park	Teak Deck Replacement	\$ 1,000,000.00
Mobile Sports Authority	Portable Basketball and Volleyball Courts	\$ 530,000.00
Mobile County Government	Master Plan for the Civil Rights and Cultural Heritage Districts	\$ 3,500,000.00
		<b>\$ 17,222,743.03</b>

Public Health- Negative Economic Impact: Public Sector Capacity		
Mobile County Government	Court Technology	\$ 869,283.86
Mobile County Government	Finance and Accounting Software	\$ 3,544,632.00
		<b>\$ 4,413,915.86</b>

Infrastructure		
Mobile County Government	Cybersecurity IT Hardware and Software	\$ 887,578.00
Mobile County Government	Mobile Metro Jail	\$ 900,000.00
		<b>\$ 1,787,578.00</b>

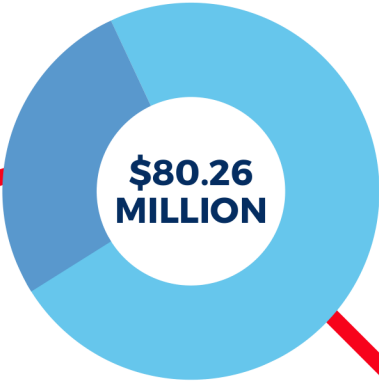
Revenue Replacement		
Mobile County Government	Employee Benefits	\$ 7,240,000.00
Mobile County Government	Commission District Funds	\$ 7,500,000.00
Mobile County Government	Aquatic Center	\$ 1,000,000.00
Mobile County Government	West Mobile County Park	\$ 3,000,000.00
		<b>\$ 18,740,000.00</b>

Administrative		
Mobile County Government	Professional Services related to ARPA funding	\$ 4,013,060.00
		<b>\$ 4,013,060.00</b>

**TOTAL: \$ 58,093,894.03**



# PROPOSED SPENDING BY CATAGORY



REMAINING ARPA FUNDS  
**\$22,167,303.97**

ALLOCATED ARPA FUNDS  
**\$58,093,894.03**

NEGATIVE ECONOMIC IMPACT  
**\$17,222,743.03**

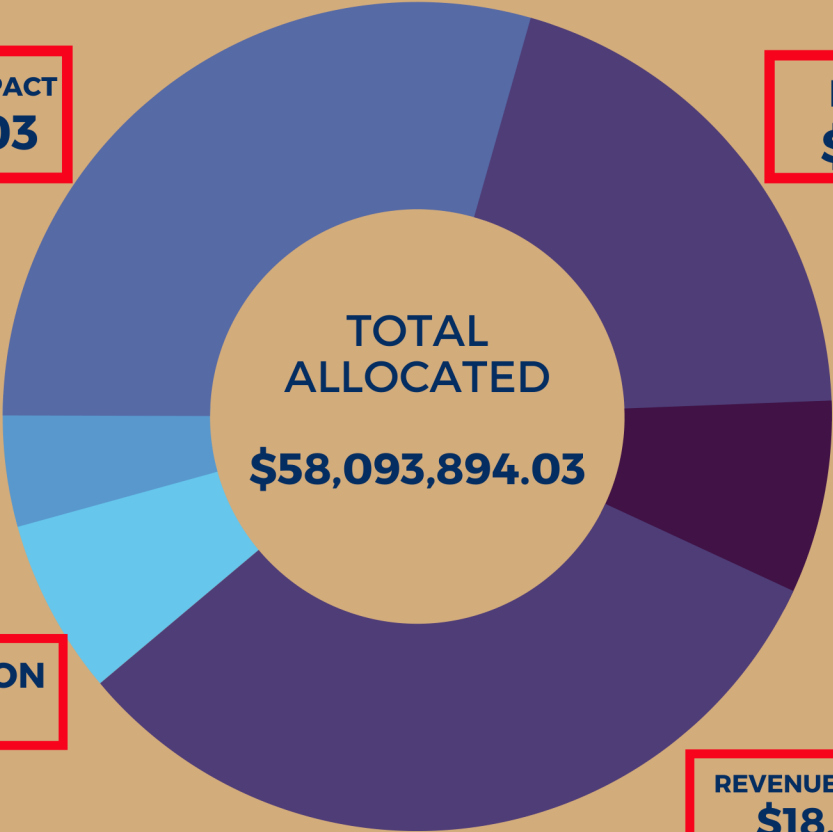
PUBLIC HEALTH  
**\$11,916,597.14**

INFRASTRUCTURE  
**\$1,787,578.00**

PUBLIC HEALTH - NEGATIVE ECONOMIC IMPACT TO PUBLIC SECTOR  
**\$4,413,915.86**

ADMINISTRATION  
**\$4,013,060.00**

REVENUE REPLACEMENT  
**\$18,740,000**





# MODIFICATIONS TO THE STRATEGIC SPENDING PLAN

Mobile County Commission's Strategic Spending Plan is intended to be flexible and adaptable to economic recovery needs. Mobile County may adjust the allocated funding to projects within the Spending Plan as necessary. This is to enable an expeditious implementation process that accounts for a variety of unknowns at the time of plan development, such as actual construction bids received for a proposed project or other grant funding that may be received at a future date. This allows Mobile County to respond quickly and without budget modifications. In addition, Mobile County may determine that a project or project component is better suited to be funded as a "Revenue Loss" allocation. This adjustment can be made to meet compliance requirements.



# COMPLIANCE AND REPORTING

As projects are advanced, Mobile County is responsible for the management, oversight, and monitoring of all SLFRF to ensure compliance with federal and state procurement regulations and the Final Rule issued by Treasury on January 6, 2022. As a result, the County recognizes the importance of implementing a robust documentation and compliance regime which is outlined below. The County established a compliance and monitoring plan for the funds received from the Federal Government through the ARPA SLFRF. The plan focuses on ensuring each recipient is engaging in eligible program activities and that all subrecipients possess the institutional, managerial, and financial capability to ensure proper planning, management, and completion of eligible projects. Mobile County Commission will incorporate special tests and provisions and adhere to internal controls best practices for effective plan implementation and execution.



# USE OF FUNDS

The U.S. Department of Treasury’s Final Rule and applicable guidance specifically provides mechanisms for funding Mobile County’s priority initiatives. Specifically, U.S. Treasury allows for the following eligible spends under the SLFRF.

### **EFFORTS TO SUPPORT THE COVID-19 PUBLIC HEALTH RESPONSE BY TARGETING THE IMPACTS OF COVID-19 ON PUBLIC HEALTH.**

Eligible expenses under this category include those geared towards COVID-19 mitigation and prevention, medical expenses, behavioral health, and preventing and responding to community violence.

### **INVESTING IN WATER, SEWER, AND BROADBAND INFRASTRUCTURE**

Eligible expenses under this category include investments in clean drinking water, supporting stormwater and wastewater infrastructure, and expanding affordable access to broadband internet.

### **SUPPORTING THE COVID-19 ECONOMIC RESPONSE BY ADDRESSING ECONOMIC HARMS TO HOUSEHOLDS, SMALL BUSINESSES, NONPROFITS, IMPACTED INDUSTRIES, AND THE PUBLIC SECTOR RESULTING FROM OR EXACERBATED BY THE PANDEMIC.**

Eligible expenses under this category include those geared towards providing relief for individuals and industries that experienced a negative economic impact that resulted from or was exacerbated by the COVID-19 pandemic.

The key to determining eligibility of both public health and economic expenditures under the SLFRF is there must be: (1) an identifiable negative impact experienced by an individual or class that resulted from or was exacerbated by the pandemic; and (2) the proposed expenditure is designed to respond to that identified negative impact.

All responses must be reasonably proportional to the public health or economic harm identified.

### **REPLACING PUBLIC SECTOR REVENUE LOSS**

In addition to the health and economic losses experienced by our residents, Mobile County experienced a significant loss of revenue largely driven by the declines in the tourism and hospitality industries. Treasury’s Final Rule specifically allows for a portion of Mobile County’s SLFRF allocation to be used under the category of revenue loss to support government services.

These eligible use categories and other restrictions were adopted as part of the federal requirements established by the U.S. Treasury on the use of funds under the program. Mobile County is required to maintain proper documentation supporting determinations of costs and applicable compliance requirements, and how such requirements have been satisfied as part of the County’s award management, internal controls, and subrecipient oversight and management.

Mobile County may use award funds to cover eligible costs that were incurred during the period that begins on March 3, 2021 and ends on December 31, 2024, as long as the award funds for the obligations incurred by December 31, 2024 are expended by December 31, 2026. Costs for projects incurred by the County prior to March 3, 2021 are not eligible. Any funds not obligated or expended for eligible uses by the timelines above must be returned to the U.S. Treasury, including any unobligated or unexpended funds that have been provided to subrecipients and contractors.



# UNIFORM GUIDANCE

Mobile County funds are subject to the requirements set forth in the Uniform Guidance. U.S. Treasury released a Compliance and Reporting Guidance for SLFRF funds which provides a general summary of the compliance responsibilities under applicable statutes and regulations, including the Uniform Guidance. The document below will serve as a guide for the performance of review activities and adherence to programmatic rules and regulations.

Section /Area	Compliance Task/Requirement	Additional Information/Resources
Allowable Activities	Internal Controls and programmatic requirements – SLFRF recipients must establish and maintain effective internal controls for the proper evaluation and monitoring of compliance. Components of internal control include: Control Environment, Risk Assessment, Control, Activities, Information and Communication, and Monitoring.	2 CFR § 200.303; Standards for Internal Control See “Special Tests and Provisions”
Allowable Costs/Cost Principles	SLFRF funds available under the “revenue loss” eligible use category may be used to meet the non-federal cost-share or matching requirements of other federal programs.	Final Rule, Section G; Final Rule Overview, p. 43; Compliance and Reporting Guidance, p. 6-8; 2 CFR § 200.420-476 General Provisions for Selected Items of Cost; Indirect costs, 2 CFR § 200.414.
Cash Management	The financial management system must include identification of awards, disclosure of financial results of each federal award, the sources and uses of funds, effective control over funds/assets, comparison of expenditures with budget, written procedures to determine the allowability of costs and to implement requirements of 2 CFR 200.305 (Federal Payment).	2 CFR § 200.302, 200.305 SLFRF payments to recipients are not subject to the Cash Management Improvement Act or 2 CFR § 200.305(b)(8-9)
Eligibility	Recipients are responsible for ensuring funds are used for eligible purposes	Retain records of eligibility determination process. Maintain procedures for obtaining information evidencing a given beneficiary, subrecipient, or contractor’s eligibility Implement risk-based due diligence for eligibility determinations.
Equipment and Real Property Management	Purchase of equipment or real property with SLFRF funds must be used for the originally authorized purpose. Equipment or real property acquired using SLFRF funds shall vest in the Federal entity. Any acquisition or maintenance of equipment or real property must be in compliance with relevant laws and regulations.	2 CFR Part 200, Subpart D 2 CFR § 200.311 and 2 § CFR 200.313
Matching, Level of Effort, Earmarking	No matching, level of effort, or earmarking compliance responsibilities associated with SLFRF awards.	See “Allowable Costs/Cost Principles” for information on the use of SLFRF funds for non-federal match or cost- sharing requirements in other federal programs.
Period of Performance	SLFRF funds must be used for costs incurred during the period that begins March 3, 2021 and ends on December 31, 2024. Award funds must be obligated by December 31, 2024, and fully expended by December 31, 2026.	Any funds not used must be returned to Treasury as part of the award closeout process pursuant to 2 C.F.R. § 200.344(d).
Procurement, Suspension, & Debarment	The non-federal entity must have and use documented procurement procedures for acquisition of goods and services required under a federal award or sub-award. Regulations restrict awards, subawards and contracts with certain parties that are debarred, suspended, or otherwise excluded from participation in federal assistance programs.	2 CFR § 200.214 (suspension, debarment); 2 CFR § 200.317-327
Program Income	The Recipient should implement include written policies that explicitly identify appropriate allocation methods, accounting standards and principles, compliance monitoring checks for program income calculations, and records.	2 CFR § 200.307
Subrecipient Monitoring	SLFRF recipients that are pass-through entities are required to manage and monitor their subrecipients to ensure compliance with requirements of the SLFRF award pursuant to 2 CFR § 200.332 regarding requirements for passthrough entities.	2 CFR § 200.1; 2 CFR § 200.330-332



# INTERNAL CONTROLS BEST PRACTICES

U.S. Treasury suggests the implementation of best practices for developing internal controls and provides an example below

Best Practices	Description	Example
Written policies and procedures	Formal documentation of recipient policies and procedures	Documented procedure for determining worker eligibility for premium pay
Written standards of conduct	Formal statement of mission, values, principles, and professional standards	Documented code of conduct / ethics for subcontractors
Risk-based due diligence	Pre-payment validations conducted according to an assessed level of risk	Enhanced eligibility review of subrecipient with imperfect performance history
Risk-based compliance monitoring	Ongoing validations conducted according to an assessed level of risk	Higher degree of monitoring for projects that have a higher risk of fraud, given program characteristics
Record maintenance and retention	Creation and storage of financial and non- financial records.	2 CFR Part 200, Subpart D 2 CFR § 200.311 and 2 § CFR 200.313



# AWARD TERMS AND CONDITIONS

Compliance obligations for recipients pursuant to the SLFRF statute, Uniform Guidance, U.S. Treasury’s Final Rule, and applicable federal laws and regulations are outlined below in the Award Terms and Conditions. Mobile County will monitor subrecipients and contractors to ensure they comply with federal procurement regulations found in 2 CFR § 200. However, both subrecipients and subcontractors will also be monitored in accordance with the Alabama Department of Finance and Administration (DFA) Procurement Manual if any procurement procedures, requirements, or thresholds within the state manual are deemed more stringent than federal regulations.

SLFRF Terms and Conditions	Detail
SAM.gov Requirements	<p>All eligible recipients are also required to have an active registration with the System for Award Management (“SAM”) (<a href="https://www.sam.gov">https://www.sam.gov</a>) pursuant to 2 CFR Part 25. To ensure timely receipt of funding, Treasury has stated that NEUs who have not previously registered with SAM.gov may do so after receipt of the award, but before the submission of mandatory reporting.</p>
Recordkeeping Requirements	<p>Generally, the organization must maintain records and financial documents for five years after all funds have been expended or returned to Treasury. Treasury may request transfer of records of long-term value at the end of such period. Wherever practicable, such records should be collected, transmitted, and stored in open and machine-readable formats</p> <p>The organization must agree to provide or make available such records to Treasury upon request, and to the Government Accountability Office (“GAO”), Treasury’s Office of Inspector General (“OIG”), and their authorized representative in order to conduct audits or other investigations.</p> <p>2 CFR § 200.334, 2 CFR § 200.337</p>
Single Audit Requirements	<p>Subrecipients that expend more than \$750,000 in federal awards during their fiscal year will be subject to an audit under the Single Audit Act and its implementing regulation at 2 CFR Part 200, Subpart F regarding audit requirements. Note that the Compliance Supplement provides information on the existing, important compliance requirements that the federal government expects to be considered as a part of such audit. The Compliance Supplement is routinely updated, and is made available in the Federal Register and on OMB’s website:  <a href="https://www.whitehouse.gov/omb/office-federal-financial-management/">https://www.whitehouse.gov/omb/office-federal-financial-management/</a></p> <p>Recipients and subrecipients should consult the Federal Audit Clearinghouse to see examples of Single Audit submissions.</p> <p>Beneficiaries are not subject to Single Audit Requirements.</p>
Civil Rights Compliance	<p>Recipients of Federal financial assistance from the Treasury are required to meet legal requirements relating to nondiscrimination and nondiscriminatory use of Federal funds. Those requirements include ensuring that entities receiving Federal financial assistance from the Treasury do not deny benefits or services, or otherwise discriminate on the basis of race, color, national origin (including limited English proficiency), disability, age, or sex (including sexual orientation and gender identity), in accordance with the following authorities: Title VI of the Civil Rights Act of 1964 (Title VI) Public Law 88-352, 42 U.S.C. 2000d-1 et seq., and the Department’s implementing regulations, 31 CFR part 22; Section 504 of the Rehabilitation Act of 1973 (Section 504), Public Law 93-112, as amended by Public Law 93-516, 29 U.S.C. 794; Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. 1681 et seq., and the Department’s implementing regulations, 31 CFR part 28; Age Discrimination Act of 1975, Public Law 94-135, 42 U.S.C. 6101 et seq., and the Department implementing regulations at 31 CFR part 23.</p> <p>In order to carry out its enforcement responsibilities under Title VI of the Civil Rights Act, Treasury will collect and review information from non-Tribal recipients to ascertain their compliance with the applicable requirements before and after providing financial assistance. Treasury’s implementing regulations, 31 CFR part 22, and the Department of Justice (DOJ) regulations, Coordination of Non-discrimination in Federally Assisted Programs, 28 CFR part 42, provide for the collection of data and information from recipients (see 28 CFR § 42.406). Treasury may request that recipients submit data for post-award compliance reviews, including information such as a narrative describing their Title VI compliance status. This collection does not apply to Tribal governments.</p>



Each award recipient is subject to reporting requirements described in Part 2: Reporting Guidance of the Compliance and Reporting Guidance issued by the U.S. Treasury which is outlined below.

Reporting Type:	Details of the Report:
Interim Report:	(For metro cities and counties) Submit through the Treasury portal. Requirement under the Interim Final Rule issued by the Treasury
	One-time report covering the period from March 3, 2021 to July 31, 2021. Report was to be submitted by August 31, 2021, or sixty (60) days after first receiving funding if the recipient's date of award was between July 15, 2021 and October 15, 2021
	Required to provide programmatic data and information for reported revenue replacement (p. 16-17 of the Compliance and Reporting Guidance)
Project and Expenditure Report:	(For metro cities and counties) Quarterly basis for beginning January 31, 2022, for period March 31, 2021 to December 31, 2021. Subsequent quarterly reports will cover one calendar quarter and must be submitted to Treasury by the last day of the month following the end of the period covered (for metro cities and counties with populations below 250,000 AND less than \$10 million in SLFRF funding, report is due April 30, 2022 and then annually).
	For each project reported within the Project and Expenditure Report, the recipient will be asked to select the appropriate Expenditure Category based on the scope of the project. Projects should be scoped to align to a single Expenditure Category. These categories can be found on pages 35-37 of the Compliance and Reporting Guidance. For select Expenditure Categories, the recipient will also be asked to provide additional programmatic data (further described on pages 19-28 of the Compliance and Reporting Guidance).
	(For metro cities and counties) Must be posted on the public-facing website of the recipient by the same date the recipient submits the report to Treasury.
	Link to the Recovery Plan template provided by Treasury: <a href="http://www.treasury.gov/SLFRP">www.treasury.gov/SLFRP</a>
	Report is due on August 31, 2021, and annually thereafter by July 31
	The Recovery Plan will provide the public and Treasury information on the projects recipients are undertaking with program funding and how they are planning to ensure program outcomes are achieved in an effective, efficient, and equitable manner. The Recovery Plan, at a minimum, will include information within the following sections: <ol style="list-style-type: none"> <li>1) Executive Summary</li> <li>2) Uses of Funds</li> <li>3) Promoting Equitable Outcomes</li> <li>4) Community Engagement</li> <li>5) Labor Practices</li> <li>6) Use of Evidence</li> <li>7) Table of Expenses by Expenditure Category</li> <li>8) Project Inventory</li> <li>9) Performance Report</li> <li>10) Required Performance Indicators and Programmatic Data</li> <li>11) Ineligible Activities: Tax Offset Provision (States and territories only)</li> </ol>



# ADDITIONAL INFORMATION

Additional Information:	Details of Additional Required Information:
Evidence-Based Intervention	<p>Recipients must identify the amount of total funds that are allocated to evidence-based intervention (see Use of Evidence section on page 31 within the Compliance and Reporting Guidance)</p> <p>Recipients must briefly describe the goals of the project and the evidence base for the interventions funded by the project.</p> <p>Recipients are exempt from reporting on evidence-based interventions in cases where a program evaluation is being conducted.</p> <p>Recipients are encouraged to use relevant evidence Clearinghouses, among other sources, to assess the level of evidence for their interventions and identify evidence-based models that could be applied in their jurisdiction.</p>
	<p>Evidence-based refers to interventions with strong or moderate evidence:</p> <ol style="list-style-type: none"> <li>1) Strong evidence – well-designed and well-implemented experimental studies conducted on the proposed program supporting conclusions with highest level of confidence</li> <li>2) Moderate evidence – reasonably developed evidence base that can support casual conclusions consisting of one or more quasi-experimental studies with positive findings on one or more intended outcomes OR two or more non- experimental studies with positive findings on one or more intended outcomes.</li> </ol>
	<p>Recipients must report on whether projects are primarily serving disproportionately impacted communities (see Project Demographic Distribution section on page 20 of the Compliance and Reporting Guidance)</p> <p>Applicable only to the Public Health and Negative Economic Impact Expenditure Categories</p>
	<p>Recipients must report whether certain types of projects are targeted to impact and disproportionately impacted communities by responding to the following questions:</p> <ol style="list-style-type: none"> <li>1) What impacted and/or disproportionately impacted population does this project primarily serve? Please select the population primarily served.</li> <li>2) If this project primarily serves more than one impacted and/or disproportionately impacted population, please select up to two additional populations served.</li> </ol> <p>Recipients will select from the options within the Impacted and Disproportionately Impacted Communities table on page 20 of the Compliance and Reporting Guidance.</p>





# REVISION LOG



# MOBILE COUNTY COMMISSION

AMERICAN RESCUE PLAN ACT • STRATEGIC SPENDING PLAN • AUGUST 2022

