

MOBILE URBAN COUNTY
CONSOLIDATED ANNUAL PERFORMANCE AND
EVALUATION REPORT

JULY 1, 2020 – JUNE 30, 2021



Mobile County Commission
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CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The PY2020 Consolidated Annual Performance and Evaluation Report (CAPER) covers the first year of the Mobile Urban County 2020-2024 Consolidated Plan, a five-year planning document that is necessary to apply for and be funded under the U.S. Department of Housing and Urban Development (HUD) formula grant programs. The Mobile Urban County (Urban County) represents all the unincorporated portions of Mobile County, as well as the cities of Bayou La Batre, Chickasaw, Creola, Citronelle, Mount Vernon, Prichard, Saraland, Semmes, and Satsuma. Mobile County Commission (Mobile County) is the designated lead agency for the Urban County Program and as such, holds the responsibility for the design and development of the various programs, activities and projects identified in the five year consolidated plan. The two programs, for which the Urban County was an entitlement grantee in 2020, were the Community Development Block Grant (CDBG) program, and the HOME program. The Urban County did not receive Emergency Solutions Grants (ESG) in PY2020. The program year for Mobile Urban County starts July 1st and ends June 30th.

For PY2020, the Urban County received \$1,621,901 of CDBG funds and with prior year funds of \$113,135 had a total of \$1,735,036 budgeted in CDBG funds. The Urban County received \$580,691 in HOME funds and with the addition of program income and recaptured funds of \$564,906 and \$30,000 respectively, the total HOME budget was \$1,175,597 .

Pursuant to the CARES Act, signed on March 27, 2020, Congress appropriated \$5 billion to the U.S. Department of Housing and Urban Development (HUD) for allocation to cities and states through the Community Development Block Grant (CDBG) program. From that allocation, HUD allocated Mobile Urban County CDBG-CV funds in the amount of \$954,256 and \$799,909 from round 1 and round 3 respectively for a total of \$1,754,165. These funds are specifically to be used to prevent, prepare for, and respond to the Coronavirus.

Since CDBG-CV allocations were received after the submission of the 2020 Action Plan, an amendment to the PY2020 Action plan was necessary to reflect these allocations. Citizen Participation notice for the amendment was provided in accordance with 24 CFR 91.105(c)(2) of the federal regulations relative to citizen participation for Community Planning and Development Programs and applicable waivers made available to those requirements through the CARES Act and as published in the Federal Register Docket No. FR-6218-N-01. The waiver reduced the required comment period to five (5) days. The Urban County is also a recipient of CDBG-CV funds from the State of Alabama.

The 2020 Action Plan provided CDBG funds for public services as well as capital expenditures for public improvement projects that include

public facilities and infrastructure projects throughout the area covered by the Urban County. The HOME program provided funds for the development of affordable rental units. All planned activities reflect priorities established within the approved 2020-2024 Consolidated Plan

CDBG-CV funds are allocated to construction/improvements to outdoor recreation facilities, food banks, legal services, mortgage rental and utility assistance, and other public services.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
CDBG-CV Administration	CDBG-CV Admin	CDBG-CV: \$	Other	Other	1	0	0.00%	1	1	0.00%
CDBG-CV Public Facilities and Infrastructure	CDBG-CV	CDBG-CV: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	12300	0	0.00%	12300	0	0.00%
CDBG-CV Public Services	CDBG-CV Public Services	CDBG-CV: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1200	154	12.83%	1200	154	12.83%

CDBG-CV Public Services	CDBG-CV Public Services	CDBG-CV: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	300	0	0.00%	300	0	0.00%
Homeowner Housing	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	75	0	0.00%	28	3	0.00%
Homeowner Housing	Affordable Housing	CDBG: \$/Home	Direct Financial Assistance to Homebuyers	Households Assisted	20	0	0.00%		0	
Program Administration	Affordable Housing Homeless Non-Housing Community Development	CDBG: \$ / HOME: \$	Other	Other	1	0	0.00%	1	1	0.00%
Public Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		0	0	0.00%

Public Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		0	0	0.00%
Public Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1350	0	0.00%			
Public Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	463	0	0.00%			
Public Services	Homeless Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	7407	1280	17.28%	1646	1280	77.76%
Rental Housing	Affordable Housing Homeless	HOME: \$	Rental units constructed	Household Housing Unit	8	0	0.00%	4	0	0.00%
Spot Blight Clearance	Non-Housing Community Development	CDBG: \$	Buildings Demolished	Buildings	20	0	0.00%			

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

In PY2020, the County completed the following CDBG and HOME funded projects (note - all projects completed in PY2020 were funded from previous program year funds): Rehabilitation of sewer lines on two streets, Construction of a walking trail at an existing park, Demolition and clearance of one blighted property, and Construction of an additional building and Improvements to the parking lot of a senior center. The above table reflects goals and accomplishments set forth in the 2020-2024 Consolidated Plan. Since PY2020 is the first-year of the 2020-2024 five-year Consolidated Plan, the accomplishment of projects funded from previous program years that were completed in PY2020 are not reflected in the table above.

Public Service Projects funded in PY2020 have all been completed and the related accomplishments included in the table above. As indicated in the 2020 Action Plan, Capital projects were not expected to be completed by the end of the 2020 program year. However all capital projects are in progress and scheduled to be completed or close to completed by the expected completion date. The Homeowner Home Emergency Repair (roof replacement) program has completed three of the nine roof replacements. The remaining six are complete, but as of this reporting date, have not been closed out. Those accomplishments will be provided in next year's CAPER.

HOME priorities addressed in the 2020 Action Plan included the development of rental units. At the time of this report, the County is at the final stages of entering into an agreement with a developer for the development of affordable rental housing. The development will leverage HOME funds with Tax Credit and private equity. In addition, the County has provided a preliminary award to a CHDO for the development of another rental development to compete for the State's LIHTC/HOME award. Prior year HOME funds provided Down Payment Assistance for homeownership to three new households.

With CDBG-CV funds, the County has engaged not-for-profit agencies to provide services to prevent, prepare for, and respond to COVID 19. Services include legal services, mortgage/rental/utility assistance to address homelessness prevention, and food insecurity. In order to provide local residents suitable outdoor fitness outlets while maintaining safe social distancing, the County is constructing/improving walking trails in Prichard, Semmes and Grand Bay. All projects are in various stages of progress and should be completed by 2022.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG	HOME
White	1	0
Black or African American	14	3
Asian	0	0
American Indian or American Native	0	0
Native Hawaiian or Other Pacific Islander	0	0
Total	15	3
Hispanic	0	0
Not Hispanic	0	3

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

The table above indicates the households assisted, in terms of persons assisted with CDBG for non-housing needs were:

White	1,505
Black/African American	600
Asian	126
American Indian/Alaskan Native	10
Native Hawaiiin/Other Paciific Islander	1
Amer. Indian/Alaskan Native & White	3
Asian & White	7
Black/African American & White	8
Amer. Indian/Alaskan Native & Black/African Amer	6
Total Hispanic	22
Other Multi- Racial	11

Persons assisted with CDBG by income category for non-housing needs were:

Extremely low (<=30%)	920 persons
Low (>30% and <=50%)	233 persons
Mod(>50% and <=80%)	465 persons

The County strives to make all of its programs and activities available to eligible low-and moderate-income residents regardless of sex, race, religious background, or disability.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	3,109,244.65	790,210.57
HOME	public - federal	3,254,274.12	143,-595.42
Other – CDBG-CV	public - federal	1,754,165	233,300.46

Table 3 - Resources Made Available

Narrative

For CDBG, CDBG-CV and HOME, resources made available reflect 2020 award allocations, program income, recaptured funds and funds from previous PY. The amount expended during program year includes projects with multi-year funding.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
CDBG Area Benefit	74	74	Areas eligible for CDBG Program area benefit.
Countywide	26	26	Non-CDBG area benefit to account for individual benefit programs.

Table 4 – Identify the geographic distribution and location of investments

Narrative

The planned percentage of allocation and the actual percentage of allocation are projected to be on target. Most PY20 projects are still on going, however funds allocated are in line with projected allocation. Percentage of allocation are was based on federal funding requirements for each formula-allocated grant (PY20). Areas of low to moderate-income concentration were targeted.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

The Urban County has utilized CDBG to leverage additional public and private funds. The two primary sources of public funds used to leverage CDBG funds are County general fund, Capital Improvement Plan funds and funds from subrecipients non-federal funds. Also, some support staff salaries of the Urban County necessary to implement CDBG projects are funded by the general fund. In addition, Urban County members have contributed funds to expand and supplement CDBG funded projects. Other forms of leveraging within the CDBG program is donated land owned by Urban County members. The County's use of HOME funds has been successful in leveraging mortgage funds from private lenders (banks, mortgage companies, and other lending institutions) for individual mortgages by providing the down payment and paying closing costs.

Due to COVID 19 hardship, the County was given a waiver to the HOME match requirement for PY20. No match funds are required for projects funded by program income. The HOME funds match requirement is satisfied in the form of cash and in-kind contributions. When the total revenue match is larger than the required match expense, the difference is accumulated for later match by the HOME program. In-kind match is contributed from the accumulated match, when HOME funds are drawn.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	1,024.43
2. Match contributed during current Federal fiscal year	5,100
3 .Total match available for current Federal fiscal year (Line 1 plus Line 2)	6,124.43
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	6,124.43

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
FTHB257	10/16/2019			100				100
FTHB258	12/04/2019			3000				3000
FTHB261	03/02/2020			2000				2000

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
864,397.21	213,112.91	87,915	0	989,595.12

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Number	0					
Dollar Amount	0					
Sub-Contracts						
Number	0					
Dollar Amount	0					
	Total	Women Business Enterprises	Male			
Contracts						
Number	0					
Dollar Amount	0					
Sub-Contracts						
Number	0					
Dollar Amount	0					

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number		0	0	0	0	0
Dollar Amount		0	0	0	0	0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired						
Businesses Displaced						
Nonprofit Organizations Displaced						
Households Temporarily Relocated, not Displaced						
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number						
Cost						

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	12	3
Number of Special-Needs households to be provided affordable housing units	20	0
Total	32	0

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	4	0
Number of households supported through Rehab of Existing Units	28	3
Number of households supported through Acquisition of Existing Units	0	4
Total	32	0

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The number of households supported through the production of new units and acquisition of existing units are derived from projects using funds made available from the action plan's one-year goals. Sometimes these type of projects can take multiple years; therefore the outcomes in the program year CAPER do not always correspond with the respective action plans.

During PY20, homeownership went up with three first time homebuyers receiving downpayment assistance.

At the time of this report, the County is at the final stages of entering into an agreement with a developer for the development of 56-unit affordable rental housing. The development will leverage HOME funds with Tax Credit and private equity. In addition, the County has provided a preliminary award for the

development of another 56-units affordable rental development, to a CHDO, to compete for the State's LIHTC/HOME award.

Discuss how these outcomes will impact future annual action plans.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	0
Low-income	0	0
Moderate-income	0	3
Total	0	0

Table 13 – Number of Households Served

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The County did not receive ESG funding, however CDBG and CDBG-CV funds were allocated to an agency to prevent or end homelessness. The Continuum of Care conducts annual surveys of homeless individuals, including unsheltered persons. The surveys served to help focus local homeless agency activities as well as provide documentation in response to HUD program requirements.

Addressing the emergency shelter and transitional housing needs of homeless persons

Homeless prevention is a major focus of the participants in the Continuum of Care. Agencies include homeless prevention as a support program in conjunction with the provision of shelter and other support services. Additionally, homeless individuals being discharged from publicly funded institutions and systems of care are being directed to the local Coordinated Assessment System for assistance.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The County provided CDBG and CDBG-CV funds for homeless prevention legal service activities and CDBG funds to a shelter for abused women

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The County appropriated local funds to various agencies including mental health providers, legal services, social services who in turn provide services to those being discharged from public funded institutions.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The Mobile Housing Board (MHB) has been approved under the Rental Assistance Demonstration (RAD) program. RAD is a voluntary program authorized by the U.S. Congress and run by the U.S. Department of Housing and Urban Development (HUD) which allows selected public housing authorities the opportunity to leverage public and private equity and to convert public housing units to project-based voucher units. The Section 8 voucher funding stream from HUD has been more stable over time. This means MHB can preserve the long-term affordability of its subsidized units without increasing the rental cost to MHB residents.

RAD provides the ability to reposition traditional public housing developments into mixed income communities, moving these outdated developments from areas of isolation to modern and thriving rental development of choice. Cottage Hill Place is the first of the RAD and Lower Income Housing Tax Credit Developments in Mobile County with development and construction underway.

The County has waived property tax for the Cottage Hill Place development in order to provide a long term viable project that will keep rents affordable for the tenants.

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

The County provides equal opportunities to public housing residents to participate in credit counseling with the goal of becoming a future homeowners. The County has formed partnerships with nonprofit organizations to increase Fair Housing activities that public housing residents wish to undertake. These classes can become a springboard for residents to attend credit counseling if bad credit prevents from securing a mortgage. All public housing residents have equal opportunity to benefit from housing assistance as well as public services.

Actions taken to provide assistance to troubled PHAs

The Urban County has no troubled PHAs.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

Mobile County has very limited barriers to the production of affordable housing and residential investment in terms of potential public policies that can impact affordable housing. Specifically, use of 2018 building codes does add costs to development, but the location of Mobile County along Alabama's GulfCoast presents unique weather related challenges (i.e., hurricanes, high winds, high volume rainfall events, etc...) that must be taken into consideration, as the costs of insuring and rebuilding are excessively high without such measures. As far as land use restrictions, the County does not have a zoning ordinance; however, there is a subdivision regulation that applies to the subdividing of land for development within the rural portion of the county. With respect to taxes, the millage rates for Mobile County are among the lowest in the nation. Mobile County currently has a rate of 48.5, which is the lower than all incorporated municipalities within the County as well as many other locations within the State of Alabama, which has the second to the lowest rates in the US. While there are no specific public policy barriers identified herein, the Action Plan does have various elements in place to help supply and encourage Affordable Housing. Specifically, down payment assistance, payment of closing costs, and mortgage assistance remove an economic barrier to affordable homeownership. Over the five year period, the County will continue to provide funds to assist with the construction of rental and homeowner housing, which contributes directly to the supply of affordable housing. In addition, the construction or rehabilitation of public infrastructure will indirectly facilitate the development of various residential building sites without adding significantly to the development costs that are passed on to homebuyers. As for direct assistance to households, the County provided homebuyer counseling through its CDBG program to help them understand the processes and responsibilities of homeownership. Under a separate program, the County used HOME funds to provide assistance to qualified low- and moderate-income homebuyers for down payments and eligible closing costs of self selected housing. The County also used HOME funds to provide mortgage assistance to homebuyers who purchased homes constructed with County HOME funds.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

Other actions taken by Mobile County to address the Community Development needs identified in the Consolidated Plan include participation in other categorical and formula grants from federal and state funding sources other than HUD that offer opportunities to channel resources toward specific problem areas that impede the quality of life for its residents. These actions have a positive impact on improving the livability of the county for all its residents. These actions, however, positively impact particularly those issues (i.e., crime, drug abuse, child abuse, violence, etc.) that have a disproportionate negative impact on low/moderate-income residents.

The following is a list of some of the other actions taken:

Juvenile Justice Programs award by Alabama Department of Youth Services These programs are awarded by the Alabama Department of Youth Services to provide services for boys and girls referred by juvenile courts as an alternative to local Department of Youth Services, including a comprehensive aftercare model which includes many necessary components identified to successfully reintegrate youth into the community exiting the alternative to incarceration.

Crime Victim Assistance These funds are for the Child Advocacy Center to provide direct services, including counseling, forensic medical exams, legal services, free transportation and court preparation, for child victims of sexual or severe physical abuse and their non-offending family members.

Violence Against Women Formula Grants These funds are used to help the Mobile County District Attorney's Office lead a coordinated community response to domestic violence. The funds will also allow the District Attorney to facilitate and conduct domestic violence training.

Justice Assistance Grant The JAG Program provides units of local government (including Mobile County, City of Prichard and City of Mobile) with funds to underwrite locally identified projects to help reduce crime and improve public safety.

Highway Traffic Safety Provides funds for a community-based program that coordinates a multi-faceted, multi-agency, public/private response to the complex highway traffic safety problems in Mobile and Baldwin Counties; this program is responsible for the enforcement of Alabama's traffic laws and education/awareness campaigns relating to traffic safety.

Corporation for National and Community Service The grant provides assistance in funding the Foster Grandparent, Senior Companion and the Retired and Senior Volunteer Program. These programs provide reimbursement expenses for volunteers over the age of 55 that perform duties as senior companions, foster grandparents to children and retired volunteers throughout the community.

Requests for Letters of Consistency are reviewed and provided, as appropriate, for projects seeking federal funding as long as they are consistent with the County's five-year Consolidated Plan. There has been no hindrance of the Consolidated Plan through action or willful inaction.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

In order to address the hazards of lead based paint, the County requires that a lead evaluation be done on any dwelling unit that received HUD HOME funding. A visual assessment of the unit is conducted to identify any deteriorated paint, dust, debris and residue so that these conditions can be corrected prior to closing. The visual assessment must be done by qualified personnel. Accordingly, the County contracts with a state licensed Home Inspection and HUD/FHA/VA/Compliance Fee Inspection Company to perform such inspections. The property owner is responsible for correcting any conditions identified in the visual

assessment. All deteriorated paint must be stabilized by properly trained or supervised workers using lead safe work practices. Information on the hazards of lead-based paint are covered through the Consumer Credit Counseling's Homebuyer Training Program and brochures are made available to all potential DPA homebuyers. Eligible homebuyers also receive the Lead Hazard Information Pamphlet, Lead Disclosure Notice, and the Notice of Lead Reduction, as required by HUD.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The County strives to foster and maintain affordable housing, as has been described elsewhere in this document, and has been mindful of opportunities to positively impact the lives of low-income persons and reduce the number of poverty level households in the community. During PY2020, the County committed CDBG funds to public service organizations to provide prescription drug assistance and to provide legal services for a homelessness prevention project.

Specific project elements undertaken during 2020 effectively serve to reduce the number of poverty level families through activities funded with CDBG and HOME funds. Over the years the County has worked with nonprofit organizations to identify qualified low-income households to participate in the down payment assistance program for homebuyers. Becoming a homeowner enables some low-income households (who have previously carried an excessive housing cost burden) to realize an increase in disposable income thus raising the quality of life for those households. Construction of affordable rental housing also enables those families/ households living below poverty (complicated by excessive housing cost burden) to realize an increase in disposable income. While no specific studies have been undertaken regarding this matter, it is reasonable to assume that reduced housing burden would raise some families above the poverty level. Further, infrastructure improvements typically create entry-level construction jobs that provide an economic stimulus and benefits for low- and moderate-income families. The County has focused on the elimination of homelessness and the impact of supportive services to low-income households to reduce the number of persons living in poverty.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The County continued to seek roundtable discussion meetings with other governmental groups or agencies, financial institutions, public housing agencies and private and nonprofit agencies with similar interests and missions. These meetings enable organizations that share common goals a venue to exchange information.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The County continued to participate in meetings with public and private housing and social service agencies in an effort to enhance coordination between these agencies in the community.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The County continues its efforts in addressing one of the leading impediments to housing affordability (lack of income), as identified in An Analysis of Impediments to Fair Housing, through the County-sponsored down payment and mortgage assistance programs. The County also continues efforts to increase the availability of affordable homes through HOME assisted construction projects. The County works with local banks, developers and non-profit organizations to expand the stock of affordable housing. The County is assisting affordable housing developers who have received County HOME funds by providing a link to affordable housing units via the County's website.

The County has contracted with Family Counseling Center of Mobile/Consumer Credit Counseling Service of Mobile, over the years through the use of CDBG public service funds, to provide housing and financial counseling services. These services are designed to equip clients with the tools and knowledge they need to improve their economic standing or to assist in maintaining current housing. By improving money management skills, low income clientele are better able to make informed decisions, which can lead to family stability and becoming self-sufficient. By improving credit scores, clients can reduce the amount of monthly expenses for loan payments and insurance, have access to mainstream financial products and services and lessen their reliance upon alternative financial services such as payday/title loans and check cashing services. In turn, this leads to opportunities to apply for better paying jobs that use credit scores in hiring decisions. This can result in adequate income for housing choice, either for rental or homeownership, which includes improved mobility. The ultimate goal is to address disparities in access to opportunity and housing needs.

The County Commission adopted The American with Disabilities Act (ADA) Transition Plan for Mobile County and has plans to mitigate identified barriers with CDBG funds as well as other resources. With respect to privately developed housing, developers are required to comply with ADA in multi-family rental properties and to make reasonable accommodations as may be required to facilitate access by a person with disabilities.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The Mobile County Grants Department uses two basic methods for monitoring grant funded projects for compliance with program rules and performance. The two methods are (1) off-site or “desk” monitoring, and (2) on-site monitoring. A “Risk Analysis” is conducted to determine how the monitoring will be done throughout the year. The results obtained from the risk analysis objectively determine which method is to be implemented. The Grants Department performs on-site monitoring and/or technical assistance when determined necessary. The County conducts an annual review of each down payment and mortgage assistance participating household to secure evidence of the purchasing household’s continued occupancy. The review occurs at twelve-month intervals beginning 12 months from the original date of occupancy. The County conducts annual financial monitoring of rental properties. Site monitoring of rental developments is based upon the schedule in §92.504(d). Unit inspections are performed and tenant files are reviewed for compliance with HOME program requirements.

The Grant Department’s objectives in monitoring grant funded projects are to document compliance with program rules; track program/project performance; ensure timely expenditure of grant funds and timely closeout of projects; and identify technical assistance needs. The Engineering Department, the Facilities Department and Grants Department are responsible for the majority of oversight/monitoring during construction of public facilities and public works/infrastructure projects. A periodic review is made of each grant to ensure the timeliness of expenditure and also that the goals and objectives are in compliance with the Consolidated Plan and Action Plan. All subrecipients are regularly monitored through draw requests for regulatory and statutory compliance. The County continually monitors program results to ensure program design leads to maximizing benefits. The County monitors all funds obligated and spent, whether spent directly, through a contract or subrecipient agreement to ensure compliance with the federal regulations. The County provides technical assistance for newly funded projects through orientation meetings, on-site visits, and by telephone.

Language in County agreements requires subrecipients to reach out to minority and women owned businesses. Most procurement for services or construction contracts includes language encouraging minority and women business enterprises to apply. When appropriate, advertisements are published or broadcast through minority targeted media.

Mobile County Commission as the lead of the Mobile Urban County oversees the development of the Consolidated Plan and the Annual Action Plans and the implementation of projects funded through Action Plans. The Commission, through the Grants Department, has responsibility for ensuring compliance with program and comprehensive planning requirements. The Urban County follows a project selection procedure that requires proposals from member jurisdictions and other public and private agencies to be

submitted. Following an eligibility determination by the Grants Department, a Project Review Committee examines proposals for feasibility, cost effectiveness, and benefit. The Committee ultimately develops and provides a non-binding budget for each formula grant program to the County Commission. The County Commission has the ultimate authority to approve projects and the budget.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

Mobile Urban County's program year ended on June 30, 2021. Submission of the PY20 CAPER made by , September 28th, 2021. On September 5th, 2021, the County published an advertisement in the Press Register to notify the public of the availability of the Consolidated Annual Performance and Evaluation Report (CAPER), the minimum of 15-day public comment period and the public hearing date of September 23rd, 2021. The minimum of 15-day comment period started September 9th, 2021 and ended on September 23rd, 2021. Copies of the CAPER were available at the offices of Mobile County Commission, on the County's website at www.mobilecountyal.gov and upon request. Comments or suggestions concerning this CAPER were to be made orally at the public hearing or/and in writing and mailed to Nayyer Mahdi, Director of Grants Management, Mobile County Commission, P. O. Box 1443, Mobile, AL 36633.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The following amendments were made In PY20:

Substantial Amendment May 24, 2021-CDBG projects: Cancel Spot Blight Clearance Project in Prichard, Cancel Handicap Ramp/Accessibility Program and reallocate funds to Street Improvements/utility Relocation for East Elm Street, Prichard.

CDBG-CV Projects: Reduce Food Banks funding, reduce Legal Services/Mortgage/rental/utilities assistance to Improvements to Whistler Bike Trail Park, Prichard and walking Trail Semmes Senior Center Improvements.

Minor Amendment March 22, 2021 -Home Emergency Repair Assistance(Roof Replacement) Program: Expand program to allow families at or below 80% AMI to participate.

Minor Amendment December 28, 2020 to reflect adjusted 2020 allocation of CDBG and HOME funds by HUD.

Substantial Amendment October 13, 2020:

- 1) Add CDBG-CV CARES Act Funds - allocation round 1 and 3 to PY20 Action Plan.
- 2) Add HOME Program Income earned from July 1, 2019 to June 30, 2020 and recaptured funds of \$30,000 to the regular HOME budget. The 15% CHDO set aside has been deleted.

Minor Amendment-July 13, 2020:

reallocate \$60,000 CDBG funds from the Home Emergency Repair Assistance program to East Elm Street improvements and public services

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Due to COVID19, HUD provided a waiver for the requirement of physical inspection. However, except for one property all properties were inspected by the end of December 2020.

On-site inspections conducted during November – December 2020 were for the following affordable rental housing units:

1. Arbours at Pierce Creek consists of 5 HOME rental units designated for seniors. On-site inspection was carried out on November 19, 2020. The HOME units were not inspected due to owner concerns over COVID-19.
2. Baytown Senior Village consists of 6 HOME rental units: Property inspection was carried out on November 3, 2020. The inspection revealed no issues with the physical condition of the property.
3. The Gardens at Wellington consists of 4 HOME rental units designated for seniors. Property inspection was carried out on December 3, 2020. The inspection revealed no issues with the physical condition of the property.
4. Eagles Landing consists of 19 transitional HOME rental units for veterans. Property inspection was carried out on December 14, 2020.
5. MoWa Choctaw Homes consists of 4 rental homes: Property inspection was carried out on December 1, 2020.
6. Pelican Landing Apartments consists of 7 HOME rental units designated for seniors. The inspection was carried out on December 9, 2020.

Owners of all properties certify that each building and all HOME-assisted units in their project are suitable for occupancy in their annual report narrative.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units.

92.351(b) As a recipient of federal funds, Mobile County has adopted affirmative marketing procedures and requirements for rental and homebuyer projects containing five or more HOME-assisted housing units. Affirmative marketing steps consist of actions that provide information and otherwise attract eligible persons in the housing market area to the available housing without regard to race, color, national or ethnic origin, age, religion, disability, sex, sexual orientation, gender identity and expression, veteran status, characteristics of personal identity, or any other characteristic protected under applicable federal

or state law. Mobile County requires developers, projects, and programs using HUD funds to affirmatively market its housing programs to ensure that eligible households have ample access and opportunity to participate in programs and services that use federal funds. Marketing efforts in PY 2020 were conducted through various HOME projects and programs using federal funds. Advertisements were sent to minority development agencies to notify minority and women owned businesses of contracting opportunities available. In addition, the County's web site continues to play a vital role in targeting information to the public and ensuring program information reaches a broad audience.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

\$31,550 of program income was drawn for Downpayment Assistance for the benefit of 3 first-time homebuyers.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

N/A