## 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 PY2022 Consolidated Annual Performance and Evaluation Report (CAPER) covers the third 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 2022, were the Community Development Block Grant (CDBG) program, and the HOME program. The Urban County did not receive Emergency Solutions Grants (ESG) in PY2022. The program year for Mobile Urban County starts July 1st and ends June 30th.
 For PY2022, the Urban County received $1,688,670 of CDBG funds and with prior year funds of $159,218 had a total of $1,847,888 budgeted in CDBG funds. The Urban County received $679,341 in HOME funds and with the addition of program income and recaptured funds of $147,151, the total HOME budget was $826,492.
 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 2022 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% |   |   |   |
| CDBG-CV Public Facilities and Infrastructure | CDBG-CV | CDBG-CV: $ | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit | Persons Assisted | 0 | 0 |   |   |   |   |
| CDBG-CV Public Services | CDBG-CV Public Services | CDBG-CV: $ | Public service activities other than Low/Moderate Income Housing Benefit | Persons Assisted | 1200 | 6921 |  576.75% | 0 | 6921 |   |
| CDBG-CV Public Services | CDBG-CV Public Services | CDBG-CV: $ | Public service activities for Low/Moderate Income Housing Benefit | Households Assisted | 300 | 346 |  115.33% |   |   |   |
| Homeowner Housing | Affordable Housing | CDBG: $ | Homeowner Housing Rehabilitated | Household Housing Unit | 75 | 16 |  21.33% | 8 | 16 |  200.00% |
| Homeowner Housing | Affordable Housing | CDBG: $ | Direct Financial Assistance to Homebuyers | Households Assisted | 20 | 21 |  105.00% |   |   |   |
| Program Administration | Affordable HousingHomelessNon-Housing Community Development | CDBG: $ / HOME: $ | Other | Other | 1 | 0 |  0.00% | 1 | 1 |  100.00% |
| Public Facilities and Infrastructure | Non-Housing Community Development | CDBG: $ | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit | Persons Assisted | 0 | 313 |   | 1644 | 313 |  19.04% |
| 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 | HomelessNon-Housing Community Development | CDBG: $ | Public service activities other than Low/Moderate Income Housing Benefit | Persons Assisted | 7407 | 1740 |  23.49% | 1245 | 1740 |  139.76% |
| Public Services | HomelessNon-Housing Community Development | CDBG: $ | Homelessness Prevention | Persons Assisted | 0 | 43 |   | 0 | 43 |   |
| Rental Housing | Affordable HousingHomeless | 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 | 20 |  100.00% | 0 | 20 |   |

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 PY2022, the County completed the following CDBG and HOME funded projects (note - some projects completed in PY2022 were funded from previous program year funds): sixteen single family home rehabilitations for low income homeowners, demolition and clearance of twenty blighted property, and improvements to a road in a low income area. The above table reflects goals and accomplishments set forth in the 2020-2024 Consolidated Plan.
 Public Service Projects funded in PY2022 have been completed and the related accomplishments included in the table above. As indicated in the 2022 Action Plan, Capital projects were not expected to be completed by the end of the 2022 program year. However all capital projects are in progress and scheduled to be completed or close to completed by the expected completion date.

HOME priorities addressed in the 2022 Action Plan included the development of rental units. At the time of this report, the County is in the construction stages of an agreement wiith a developer for the development of 56 units 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.
 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, senior services, child care services, 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 Semmes and Grand Bay utilizing CDBG-CV provided by the State of Alabama. All projects are in various stages of progress and should be completed in 2023.

## 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 | 4 | 0 |
| Black or African American | 32 | 0 |
| Asian | 0 | 0 |
| American Indian or American Native | 1 | 0 |
| Native Hawaiian or Other Pacific Islander | 0 | 0 |

|  |  |  |
| --- | --- | --- |
|  |  |  |
| **Total** | **37** | **0** |

|  |  |  |
| --- | --- | --- |
|  |  |  |
| Hispanic | 2 | 0 |
| Not Hispanic | 35 | 0 |

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

**Narrative**

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. All projects carried out in 2022 assisted low-moderate income persons/households. The table above indicates the households assisted, in terms of persons assisted with CDBG for non-housing needs were:
 White 7,527
 Black/African American 1,480
 Asian 202
 American Indian/Alaskan Native 112
 Native Hawaiin/Other Paciific Islander 5
 Amer. Indian/Alaskan Native & White 89
 Asian & White 6
 Black/African American &White 41
 Amer. Indian/Alaskan Native & Black/African Amer 60
 Total Hispanic 125
 Other Multi- Racial 52
 Persons assisted with CDBG by income category for non-housing needs were:

 Extremely low (<=30%) 217 persons
 Low (>30% and <=50%) 246 persons
 Mod(>50% and <=80%) 578 persons

## 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 | 1,847,888 | 766,614 |
| HOME | public - federal | 826,493 | 97,508 |

Table 3 - Resources Made Available

**Narrative**

For CDBG, CDBG-CV and HOME, resources made available reflect 2022 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 | 82 | 82 | Areas eligible for CDBG Program area benefit. |
| Countywide | 18 | 18 | 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 close to on target.  Most PY22 projects are still ongoing, however funds allocated are in line with projected allocation.  Percentage of allocation were based on federal funding requirements for each formula-allocated grant (PY22).  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.
 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 | 24,124 |
| 2. Match contributed during current Federal fiscal year | 1,000 |
| 3. Total match available for current Federal fiscal year (Line 1 plus Line 2) | 25,124 |
| 4. Match liability for current Federal fiscal year | 0 |
| 5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4) | 25,124 |

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** |
| FTHB266 | 04/15/2022 | 0 | 0 | 1,000 | 0 | 0 | 0 | 1,000 |

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 begin-ning 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****$** |
| 877,637 | 81,253 | 14,715 | 0 | 944,176 |

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** |
|  |  |  |  |  |  |  |
| Dollar Amount | 0 | 0 | 0 | 0 | 0 | 0 |
| Number | 0 | 0 | 0 | 0 | 0 | 0 |

|  |
| --- |
| **Sub-Contracts** |
|  |  |  |  |  |  |  |
| Number | 0 | 0 | 0 | 0 | 0 | 0 |
| Dollar Amount | 0 | 0 | 0 | 0 | 0 | 0 |

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Total** | **Women Business Enterprises** | **Male** |

|  |
| --- |
| **Contracts** |
|  |  |  |  |
| Dollar Amount | 0 | 0 | 0 |
| Number | 0 | 0 | 0 |

|  |
| --- |
| **Sub-Contracts** |
|  |  |  |  |
| Number | 0 | 0 | 0 |
| Dollar Amount | 0 | 0 | 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 | 0 |
| Dollar Amount | 0 | 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 |

|  |  |  |
| --- | --- | --- |
|  | **Number** | **Cost** |
| Parcels Acquired | 0 | 0 |
| Businesses Displaced | 0 | 0 |
| Nonprofit Organizations Displaced | 0 | 0 |
| Households Temporarily Relocated, not Displaced | 0 | 0 |

|  |  |  |  |
| --- | --- | --- | --- |
| **Households Displaced** | **Total** | **Minority Property Enterprises** | **White Non-Hispanic** |
| **Alaskan Native or American Indian** | **Asian or Pacific Islander** | **Black Non-Hispanic** | **Hispanic** |
| Number | 0 | 0 | 0 | 0 | 0 | 0 |
| Cost | 0 | 0 | 0 | 0 | 0 | 0 |

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 | 2 |
| Number of Special-Needs households to be provided affordable housing units | 0 | 0 |
| **Total** | **12** | **2** |

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 | 8 | 16 |
| Number of households supported through Acquisition of Existing Units | 0 | 0 |
| **Total** | **12** | **16** |

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.
At the time of this report, the County is in the construction stages of an agreement wiith a developer for the development of 56 units of affordable rental housing. This project is within months of completing. 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.

**Discuss how these outcomes will impact future annual action plans.**

The COVID-19 Pandemic caused delays and increased construction costs for existing multi-family affordable housing development projects. This has lead to a delay in the creation of rental housing units which will therefore show up in later Action Plan accomplishments.

**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 | 4 | 0 |
| Low-income | 2 | 0 |
| Moderate-income | 5 | 0 |
| **Total** | **11** | **0** |

Table 13 – Number of Households Served

**Narrative Information**

Mobile County continues to place a high priority on activities benefit entirely low to moderate income individuals with one hundred percent of public service project beneficiaries qualifying under HUD income guidelines in excess of the mandated minimum requirements.

## 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 agencies 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.   Additonally, 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 and legal service activities and CDBG funds to a shelter for victims of domestic violence.

**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, and 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 opportunites 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. The County is also in coordination with the Prichard Housing Authority to provide their residents the opportunity to become homeowners utilizing their existing Housing Choice Vouchers.

**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   public policies that can potentially 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 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 has also previously 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 PY2022, 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 2022 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 accomodations 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, 2023.  Submission of the PY22 CAPER made by , September 28th, 2022. On September 9th, 2023, the County posted an advertisement on its website and on September 13th published a notice in the Lagniappe 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 21st, 2023.  The  minimum of 15-day comment period started September 9th, 2022 and ended on September 27th, 2022.  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 Gordon Bauer, 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.**

Summary Amendments during PY2022 (Detailed information can be found in the Citizen Participation Comments attachments)

December 27, 2022 Substantial Amendment to PY2020 AP:  Substantial amendment to the PY2020 Action Plan  to reduce CDBG-CV funds for Semmes Senior Center Improvements by $163,278.38; and reallocate CDBG-CV funds of $163,278.38 to Improvements to Whistler Bicycle Trail Park in Prichard.

March 27, 2023 Substantial Amendment to PY 2019, 2021, and 2022 AP: Substantial amendment to the 2019, 2021, and 2022 Action Plans to 1) Remove Easyway Street, Preferred Life Road and Hickory Road from the project titled Street Improvements-South Mobile County and add Georgia Avenue W (PY2022);  2) Reallocate CDBG funds of $5,000 from the project Spot Blight Clearance-Countywide (PY2019), $100,000 from the Spot Blight Clearance-Bayou La Batre (PY2021) and $400,000 from the project Rehabilitation of Bridges on Warren Street and Wasson Avenue (PY2022) to a Improvements to  Whistler Bike Trail project  3. Include HOME Program Income accumulated from around May 1, 2022 to June 30, 2022 in the amount of $54,640.88 to the PY2022 HOME budget for administration and development of rental housing.

April 10, 2023 Substantial Amendment to PY2020 AP: Substantial amendment to the 2020 Action Plan to reduce Transportation Services funding by $23,132.85, and reduce Health Services funding by $11,089.58 and cancel the Improvements to Whistler Bicycle Trail Park project ($503,278.38); and reallocate CDBG-CV funds of $297,840.01 to Legal Services/ Mortgage/ Rentals Assistance, and reallocate CDBG-CV funds of $239,660.80 to Administration.

**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 24 CFR 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 24 CFR §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.

All properties were inspected by the end of August 2023.
 On-site inspections conducted during July and August 2023 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 July 17, 2023. The inspection revealed no major issues with the physical condition of the property.
 2. Baytown Senior Village consists of 6 HOME rental units: Property inspection was carried out on August 15, 2023. The inspection revealed no major 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 August 10, 2023. The inspection revealed no major 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 August 21, 2023. The inspection revealed no major issues with the physical condition of the property.
 5. MoWa Choctaw Homes consists of 4 rental homes: Property inspection was carried out on July 25, 2023. The inspection revealed some minor damage to the properties which has is in the process of being repaired.
 6. Pelican Landing Apartments consists of 7 HOME rental units designated for seniors. The inspection was carried out on August 16, 2023. The inspection revealed no major issues with the physical condition of the property.
 7. Arbours at Satsuma consists of 6 HOME rental units. The inspection was carried out on July 18, 2023. The inspection revealed no major issues with the physical condition of the property.
 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. 24 CFR 91.520(e) and 24 CFR 92.351(a)**

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 2022 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**

No program income was drawn for projects during the current year.

**Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 24 CFR 91.320(j)**

N/A

## CR-58 – Section 3

**Identify the number of individuals assisted and the types of assistance provided**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Total Labor Hours** | **CDBG** | **HOME** | **ESG** | **HOPWA** | **HTF** |
| Total Number of Activities | 1 | 0 | 0 | 0 | 0 |
| Total Labor Hours | 3,992 |   |   |   |   |
| Total Section 3 Worker Hours | 0 |   |   |   |   |
| Total Targeted Section 3 Worker Hours | 0 |   |   |   |   |

Table 15 – Total Labor Hours

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Qualitative Efforts - Number of Activities by Program** | **CDBG** | **HOME** | **ESG** | **HOPWA** | **HTF** |
| Outreach efforts to generate job applicants who are Public Housing Targeted Workers |   |   |   |   |   |
| Outreach efforts to generate job applicants who are Other Funding Targeted Workers. |   |   |   |   |   |
| Direct, on-the job training (including apprenticeships). |   |   |   |   |   |
| Indirect training such as arranging for, contracting for, or paying tuition for, off-site training. |   |   |   |   |   |
| Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching). |   |   |   |   |   |
| Outreach efforts to identify and secure bids from Section 3 business concerns. | 1 |   |   |   |   |
| Technical assistance to help Section 3 business concerns understand and bid on contracts. |   |   |   |   |   |
| Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns. |   |   |   |   |   |
| Provided or connected residents with assistance in seeking employment including: drafting resumes,preparing for interviews, finding job opportunities, connecting residents to job placement services. |   |   |   |   |   |
| Held one or more job fairs. |   |   |   |   |   |
| Provided or connected residents with supportive services that can provide direct services or referrals. |   |   |   |   |   |
| Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation. |   |   |   |   |   |
| Assisted residents with finding child care. |   |   |   |   |   |
| Assisted residents to apply for, or attend community college or a four year educational institution. |   |   |   |   |   |
| Assisted residents to apply for, or attend vocational/technical training. |   |   |   |   |   |
| Assisted residents to obtain financial literacy training and/or coaching. |   |   |   |   |   |
| Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns. |   |   |   |   |   |
| Provided or connected residents with training on computer use or online technologies. |   |   |   |   |   |
| Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses. | 1 |   |   |   |   |
| Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act. |   |   |   |   |   |
| Other. |   |   |   |   |   |

Table 16 – Qualitative Efforts - Number of Activities by Program

**Narrative**

There is one completed CDBG projects from PY22 which meet the funding thresholds to require compliance with Section 3 guidelines. Multiple qualitative efforts were taken to boost Section 3 accomplishments for this activity.