

Mobile County, Alabama

Disaster Shelter Project Guide



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Introduction

Executive Summary

This Disaster Shelter Project Policies and Procedures Guide serves as a resource for the County and stakeholders in the development and implementation of disaster shelter project(s) funded through Community Development Block Grant-Disaster Recovery (CDBG-DR) Programs. The guide provides a structural framework for compliance, efficiency, and accountability in disaster shelter project(s), addressing the unique challenges associated with disaster recovery and community resilience.

Disaster shelters are essential in protecting vulnerable populations during emergencies, providing safe refuge, and offering critical services for those impacted by disaster. This guide outlines clear, step-by-step policies and procedures to assist the County in achieving compliance, community needs, and enhancing disaster preparedness.

Key Components of the Guide:

- Program Governance and Compliance:
 - Policies for ensuring eligibility under CDBG-DR requirements, including alignment with HUD National Objectives.
 - Compliance with cross-cutting federal regulations such as environmental review (NEPA), procurement, labor standards (Davis-Bacon), and Section 3 requirements.
 - Guidance on adherence to fair housing and accessibility regulations, including the Americans with Disabilities Act (ADA).
- Project Planning and Design:
 - Procedures for conducting needs assessments to identify shelter demand and capacity requirements.
 - Criteria for site selection, feasibility studies, and alignment with local hazard mitigation plans.
 - Standards for shelter design, incorporating resilience measures, universal design, and energy efficiency.
- Funding and Financial Management:
 - Clear policies for budgeting, financial tracking, and cost allocation.
 - Guidelines for managing multiple funding sources and ensuring compliance with duplication of benefits regulations.
- Shelter Operations and Maintenance:
 - Procedures for developing operational frameworks, including shelter activation, staffing, and resource management.
 - Policies for community engagement, particularly for vulnerable populations and individuals with access and functional needs.

- Maintenance and sustainability strategies to ensure long-term functionality and readiness.
- Monitoring and Reporting:
 - Detailed requirements for data collection, performance tracking, and reporting to HUD.
 - Procedures for conducting internal and external monitoring to ensure compliance and project effectiveness.
- Risk Management and Problem Resolution:
 - Policies for mitigating risks, addressing noncompliance, and resolving challenges during project implementation.

The guide is designed to assist communities in achieving the following goals:

- Establish disaster shelters that are safe, accessible, and equitable for all residents, particularly those from underserved or vulnerable populations.
- Build local capacity to respond to future disasters with resilient shelter infrastructure.
- Ensure full compliance with federal regulations while maintaining transparency and accountability.
- Promote collaboration among local governments, non-profits, and other stakeholders to maximize project impact.

By following the policies and procedures outlined in this guide, the County will ensure the successful planning, implementation, and management of disaster shelter projects that meet HUD requirements and serve the long-term recovery and resilience needs of the community.

Administration

The Alabama Department of Economic and Community Affairs

The Alabama Department of Economic and Community Affairs (ADECA) serves as the grantee of the Community Development Block Grant – Disaster Recovery (CDBG-DR) funds allocated to the State of Alabama by the U.S. Department of Housing and Urban Development (HUD). As the grantee, ADECA is responsible for the administration, oversight, and distribution of funds to support Mobile County’s disaster recovery efforts. Mobile County, acting as a subrecipient under ADECA, will implement specific programs and projects funded by CDBG-DR dollars in accordance with ADECA’s policies, procedures, and project requirements.

Mobile County Commission

The Mobile County Commission (the County), as the program administrator, is responsible for overseeing the implementation of the project, ensuring compliance with federal, state and local regulations, and providing coordination with awarded applicants throughout the project lifecycle.

Local Municipalities and Non-for-profits

The County will collaborate and partner with local municipalities and nonprofit organizations to ensure effective implementation of the project.

National Objective and Tie Back

The Disaster Shelter project meets the National Objective of Urgent Need. This project aims to mitigate the risks posed by future disasters by ensuring that an emergency shelter is structurally sound and capable of providing safe and secure protection throughout Mobile County. As the project advances, the County will further evaluate the project's service area to determine whether it meets the LMA national objective. The eligible activity is construction, reconstruction, repair or installation of public facilities and improvements pursuant to 24 CFR 570.482 and Section 105 of Title I of the Housing and Community Development Act of 1974.

Mobile County has faced significant challenges due to Hurricanes Sally and Zeta. These hurricanes caused widespread damage, including power outages, flooding, and structural damage to homes, buildings and infrastructure. Existing emergency shelters were found to be inadequate in terms of location and resilience, highlighting the critical need for identifying and building a new facility to ensure they can provide safe refuge pre-, during, and post disasters. Additional disaster related tieback and need will be documented in the project application.

Funding Availability

The Mobile County Commission will allocate \$8,155,980 of CDBG-DR funding to this project with an additional 15 percent for Activity Delivery Cost of \$1,223,396, totaling \$9,379,376.

Eligible Activities

The eligible activity is construction, reconstruction, repair or installation of public facilities and improvements pursuant to 24 CFR 570.482 and Section 105 of Title I of the Housing and Community Development Act of 1974.

To aid in the recovery from Hurricanes Sally and Zeta and enhance the County's disaster resilience capabilities for future storms, the County is proposing a new Disaster Shelter Project. This project is set to establish a safe and accessible shelter for County residents, as well as expand the County's existing programs in service of its vulnerable populations. The project integrates specific requirements and standards for disaster readiness and community service, ensuring that the facility is not only a critical public facilities project but also a cornerstone of community development and support.

The project will consist of identifying, assessing, and building a new disaster shelter. Phase I will identify potential locations and evaluate the feasibility of a facility within the County that could serve as emergency shelter pre-, during, and post disasters with emphasis on the identified MID Recovery Zones. It will consider establishing a future emergency shelter in high-elevation, low-risk areas with a focus on serving vulnerable populations least likely to have a place to go in an emergency. The assessment will then lead to a detailed design plan. This feasibility assessment will be Countywide.

Phase II will consist of the construction of a new Disaster Shelter that was identified as part of Phase I. Construction may include, but will not be limited to, structural integrity of the facilities to withstand severe weather conditions, flood proofing measures, wind protection, and permanent generator power. By identifying, assessing, and building a disaster shelter, this project aims to create a safe and secure facility to provide protection and support to the local communities pre-, during, and post a disaster.

The shelter would meet the American Red Cross' Hurricane Evacuation Shelter Selection Standards.

Project Feasibility

The Disaster Shelter Project is a critical component of the County's disaster recovery strategy, aimed at providing safe, accessible, and adequately equipped shelter options for residents during disaster events. The project will address gaps in existing shelter capacity and ensure that residents, particularly vulnerable populations, have access to secure facilities during emergencies.

To ensure program feasibility, the shelter project will be assessed for alignment with program priorities and eligibility criteria prior to approval. This review process will verify that the proposed shelter locations meet community needs, are strategically situated to maximize accessibility, and comply with federal and state guidelines for disaster shelters. Additionally, the project will be vetted to confirm that no choice-limiting actions, such as construction or land acquisition, have occurred prior to the release of funds, ensuring compliance with HUD regulations.

The County will provide technical assistance to project stakeholders throughout the project lifecycle to ensure adherence to all cross-cutting requirements, including environmental review, accessibility under the Americans with Disabilities Act (ADA), fair housing compliance, and labor standards. This proactive approach will help prevent delays and ensure that all regulatory obligations are met during the project's planning and implementation phases.

The project will include a comprehensive scope of work that outlines specific activities, milestones, and deliverables. This detailed planning ensures that all project components, such as site selection, construction, and equipping the shelter with necessary resources, are executed efficiently and effectively. The scope of work will also incorporate measures for the shelter's long-

term maintenance and operational sustainability, ensuring its continued functionality as a community asset.

The Disaster Shelter Project is structured to achieve its objectives while meeting HUDs regulatory standards. This comprehensive approach ensures the project's feasibility and its alignment with the County's disaster recovery and resilience goals, providing a vital resource for community safety during emergencies.

The Disaster Shelter Project is designed to ensure compliance with federal regulations while addressing the community's recovery and resiliency needs. The funded contractor will enter into a formal agreement with the Mobile County Commission (MCC). This agreement will define the terms and conditions of the CDBG-DR funding, ensuring clarity, accountability, and adherence to the program guidelines.

By implementing the agreement, the MCC will effectively meet all cross-cutting requirements mandated by HUD. This includes compliance with fair housing regulations and other federal policies designed to promote equity in disaster recovery. Additionally, the agreement serves as a mechanism to monitor and document program outcomes, ensuring that assistance is used appropriately and aligns with HUD, ADECA and the County's objectives.

MCCs administrative capacity and experience in managing federally funded programs further reinforce the feasibility of the Disaster Shelter Project. Established processes and oversight by the County will allow project participants to comply with all applicable rules. Moreover, the assistance provided aligns with the long-term recovery needs of the community, while ensuring resiliency in the event of another disaster.

Project Partners

The County will identify a potential project partner following Phase I, assessment of potential locations. Partners may include, but are not limited to, local municipalities, non-governmental organizations (NGOs) and tribal governments.

Project Delivery and Implementation

The delivery and implementation of a disaster shelter project funded CDBG-DR requires a structured approach to ensure compliance, efficiency, and community impact. This section provides a framework for project execution, outlining the key phases, responsible entities, compliance measures, and oversight requirements necessary for the successful completion of the project. Effective implementation ensures the timely construction of a resilient and accessible disaster shelter that meets federal and local regulations.

Proposed Milestones and Timeline

The disaster shelter project will be implemented in four primary phases: Pre-Development and Planning, Design and Procurement, Construction and Implementation, and Closeout and Transition to Operations. Each phase includes critical milestones that ensure compliance with HUDs CDBG-DR regulations and local resilience goals. The anticipated timeline for project completion will depend on site selection, permitting, procurement, and construction activities. The below provides a general breakdown of the project phases and expected duration.

Milestone/ Deliverable	Phase and Timeline
Initial Assessment and Design	1-12 Months
Permitting and Approvals	4-12 Months
Construction and Retrofitting	12-24 Months
Monitoring and Project Completion	24 Months

Roles and Responsibilities

Mobile County, as the implementing agency, will serve as the primary administrator of funds and the overall project manager. The County will ensure compliance with all HUD requirements, oversee planning efforts, manage stakeholder engagement, and provide financial oversight to guarantee proper fund utilization. Additionally, Mobile County will coordinate with local and state emergency management agencies to align the shelter with regional disaster response plans.

Engineering and design consultants will be engaged to create architectural and structural plans that meet FEMA hazard mitigation standards, ADA requirements, and environmental regulations. Contractors will be selected through a competitive bidding process to execute construction activities, with the County monitoring their performance to ensure adherence to project specifications and timelines. Regulatory agencies, including HUD and ADECA, will provide oversight to verify compliance with funding, environmental, and labor standards.

Community Needs and Site Selection

The selection of a disaster shelter site must be based on a comprehensive assessment of community needs, ensuring that the facility provides equitable access and serves the most vulnerable populations. Mobile County will conduct a thorough analysis of historical disaster impacts, population density, and evacuation routes to identify an optimal location. Consideration will also be given to the proximity of major roadways, public transportation options, and emergency response facilities to enhance accessibility.

Community engagement will play a crucial role in site selection, input from residents, emergency management agencies, and other stakeholders will be gathered. Environmental factors such as floodplain location, topography, and soil stability will be evaluated to mitigate potential risks. Additionally, the site must comply with local zoning laws and land-use policies, ensuring that it is

suitable for a disaster shelter under existing regulatory frameworks. Through this data-driven approach, Mobile County will select a location that maximizes the shelter's effectiveness and ensures its long-term viability.

Design Standards

The disaster shelter will be designed to meet rigorous safety, accessibility, and durability standards to ensure functionality during emergency events. The structure must comply with FEMA's guidelines for storm shelters, including the ability to withstand extreme wind speeds and potential impact from debris. The facility will also be built in compliance with the Americans with Disabilities Act (ADA), ensuring that all community members, including individuals with disabilities, can access and utilize the shelter.

The building design will incorporate energy-efficient and sustainable materials to reduce operational costs and environmental impact. The shelter will include reinforced roofing, impact-resistant windows, and backup power systems to ensure continuous operation during disasters. Space planning will accommodate both short-term and long-term occupancy, with designated areas for medical assistance, food distribution, and emergency coordination. Mobile County will collaborate with architects and engineers to ensure that all structural and mechanical systems are optimized for disaster resilience.

Resilience Measures

The disaster shelter will incorporate resilience measures that enhance its ability to withstand and recover from disasters. Key elements will include flood mitigation strategies, such as elevated construction in flood-prone areas and the use of permeable surfaces to improve stormwater drainage. The shelter will also feature redundant power systems, including generator backup and solar energy integration, to ensure that critical functions remain operational even during extended power outages.

The facility's design will also consider climate adaptation strategies, such as high-efficiency insulation and cooling systems to maintain comfortable conditions in extreme temperatures. A secure water supply and wastewater management system will be integrated to support extended sheltering operations. Additionally, Mobile County will coordinate with emergency response agencies to establish protocols for rapid activation, ensuring that the shelter is ready to accommodate displaced residents at a moment's notice. When feasible, the County will implement activities into project implementation the support and align with the activities and practices outlined in the [Alabama State Hazard Mitigation Plan](#).

Shelter Operations and Maintenance

Once the disaster shelter is constructed, Mobile County will implement a long-term operations and maintenance plan to ensure its continued readiness. The shelter will be managed by designated emergency personnel who will be responsible for its activation, security, and resource

distribution during emergency events. Regular training exercises and emergency drills will be conducted to ensure that staff are prepared to manage shelter operations effectively.

Routine maintenance will be scheduled to inspect and service critical systems, including HVAC, plumbing, electrical, and backup power. The facility will also undergo periodic structural assessments to ensure that it remains compliant with evolving safety standards. Funding allocations for ongoing maintenance will be established, ensuring that the shelter remains in optimal condition for future use. Additionally, Mobile County will engage in continuous public outreach to educate residents on shelter availability, access procedures, and the resources provided during disasters.

Financial Management and Compliance

Proper financial management and compliance are critical to the successful implementation of the Disaster Shelter Project. This section outlines financial controls, funding allocation, cost eligibility, procurement standards, and reporting requirements to ensure compliance with HUD regulations. Mobile County Government, or the designated grant recipient, must adhere to financial measures to ensure the transparent and responsible use of federal funds.

Budgeting and Cost Eligibility

A well-defined budget ensures that project expenditures align with CDBG-DR regulations and funding objectives. All costs associated with the disaster shelter must be necessary, reasonable, and properly documented to qualify for reimbursement. HUDs cost eligibility guidelines will determine whether expenses are allowable. Eligible costs include:

- **Pre-Development Expenses** - Engineering studies, environmental assessments, feasibility analyses, and site selection reviews.
- **Construction and Rehabilitation Costs** - Materials, labor, and equipment necessary for the completion of the shelter.
- **Mitigation and Resilience Measures** - Floodproofing, energy-efficient systems, and hazard-resistant infrastructure enhancements.
- **Administrative and Project Management Costs** - Costs related to grant management, procurement, and compliance oversight.
- **Procurement and Contracting Expenses** - Costs incurred for competitive bidding processes and contractor selection.

Costs that do not directly support the project exceed allowable limits or lack proper documentation will be deemed ineligible for reimbursement.

Grant Management and Financial Oversight

CDBG-DR financial management requires strong internal controls to ensure compliance with HUD and federal regulations. The grant recipient must maintain accurate financial records, track fund disbursements, and submit required financial reports to HUD or the state administering agency. Key financial oversight measures include:

- **Segregation of Funds** - CDBG-DR funds must be maintained in a separate account from other local, state, or federal funding sources.
- **Reimbursement Process** - Expenses must be pre-approved and documented before reimbursement requests are submitted.
- **Financial Tracking and Reporting** - Regular updates on expenditures, fund balances, and project progress must be provided through Quarterly Performance Reports (QPRs).
- **Grant Monitoring and Audit Compliance** - Financial records must be available for periodic reviews, internal audits, and HUD monitoring visits.

Procurement and Contract Compliance

Procurement activities must adhere to the federal standards outlined in 2 CFR Part 200, ensuring fair and competitive selection of contractors and service providers. All contracts must meet HUD and local procurement standards and be awarded through an open and transparent process. Procurement compliance requirements include:

- **Competitive Bidding** - All contracts must be awarded through a competitive process that ensures cost-effectiveness and fairness.
- **Conflict of Interest Policies** - No individual involved in the procurement process may have a financial interest in a contract award.
- **Davis-Bacon Act Compliance** - All laborers and mechanics working on construction must be paid prevailing wages as determined by the U.S. Department of Labor.
- **Section 3 Compliance** - Priority must be given to local businesses and low-income residents for employment and contracting opportunities.
- **Contract Monitoring** - All contracts must be actively monitored to ensure performance, compliance, and adherence to project timelines.

Financial Monitoring and Audit Readiness

Regular financial monitoring and audit compliance are essential to preventing fraud, waste, and mismanagement of CDBG-DR funds. HUD requires all grantees to undergo financial reviews and audits to verify proper fund usage and adherence to grant conditions. The following financial monitoring measures will be implemented:

- **Quarterly and Annual Financial Reports** - Documenting fund expenditures, cost allocations, and budget reconciliations.

- **Internal Audits** - Conducted periodically to review compliance with CDBG-DR regulations and best financial practices.
- **HUD Monitoring Reviews** - Ensuring full transparency and readiness for federal grant monitoring visits and audits.
- **Retention of Financial Records** - All financial records, including invoices, payroll records, and procurement documentation, must be retained for a minimum of five years from project closeout.

Cross-Cutting Requirements

This section outlines the key HUD cross-cutting requirements. For additional information on each cross-cutting requirement, please reference the County's CDBG-DR Manual. Technical assistance will be provided to all subrecipients throughout the grant's lifecycle. Below is a high-level overview of cross-cutting requirements. Please refer to the County's CDBG-DR Manual for more detailed information.





Procurement

Procurement will be required for the contracting and material purchases. This is recommended through an RFP and contract. The County will be required to follow the federal procurement regulations detailed in [2 CFR Part 200](#).

Duplication of Benefits

Duplication of Benefits (DOB) occurs when an individual or entity receives financial assistance from multiple sources for the same purpose, and the total amount received exceeds the need or eligible costs for that purpose. Under Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) and HUDs CDBG-DR guidelines, the County and its recipients must take steps to prevent and remedy any instances of DOB.

DOB compliance is essential to ensure that program funds are used efficiently, meeting legitimate needs, and avoid the improper use of federal resources. This is to prevent "double dipping" or excessive funding, which can occur if program funds are combined with other financial aid, grants, or benefits without proper analysis. The following steps will be used to ensure that DOB does not occur under this program:

	Review all available funding sources		Coordination with other assistance
	Calculation of Unmet Needs		Recovery of excess funds



Monitoring and Verification



Documentation

Davis Bacon and Related Acts

As a Subrecipient to ADECA, the County is responsible for adhering to Davis Bacon and Related Acts (DBRA) regulations. Generally, most awarded infrastructure projects will be subject to DBRA. DBRA applies to contractors and subcontractors performing on federally funded or assisted contracts in excess of \$2,000 for the construction, alteration, or repair of public buildings or public works.¹

Section 3

All projects receiving more than \$200,000 in HUD assistance at a project site are required to comply with the “new” Section 3 rule, as detailed in [24 CFR Part 75](#). This includes tracking of all labor hours on the project sites, including projects not subject to Davis Bacon, and qualitative efforts undertaken to demonstrate compliance.

Fraud, Waste, and Abuse

The County has zero tolerance for the commission or concealment of acts of fraud, waste, or abuse. Any instances of fraud, waste, or abuse should be reported to the HUD OIG at 1-800-347-3735 or hotline@hudoig.gov. All instances of fraud, waste, and abuse discovered by the County will be reported to ADECA and HUD OIG.

Monitoring and Compliance

Monitoring and compliance are critical components of the Disaster Shelter Project to ensure adherence to HUDs CDBG-DR funding requirements. This section outlines the processes for project performance monitoring, regulatory compliance, financial oversight, and reporting obligations. Mobile County, or the designated grant recipient, must establish rigorous compliance measures to ensure transparency, accountability, and efficiency in the use of CDBG-DR funds.

The County will conduct on-going monitoring and compliance checks with their subrecipients to ensure both state and federal requirements are met. ADECA, as the grantee holds oversight over the grant and will conduct periodic monitoring site visits both onsite and virtually. Following all monitoring visits, the County will share any monitoring and compliance report received with the awardee. In general, onsite monitoring visits are completed when at least 50% of expenditures have been requested and at the end of the construction period.

¹ [Davis-Bacon and Related Acts | U.S. Department of Labor](#)

Project Performance Monitoring

Regular monitoring is essential to track the progress of the disaster shelter project and verify compliance with CDBG-DR program objectives. Performance monitoring will involve site visits, construction progress reports, financial tracking, and documentation reviews to assess whether project goals are being met. The following key areas will be monitored:

- **Construction Progress** - Ensuring adherence to the approved project timeline, contractor performance, and milestone completion.
- **Quality Assurance and Safety Compliance** - Verifying that construction meets applicable building codes, HUD resilience standards, and FEMA hazard mitigation criteria.
- **Labor Standards Compliance** - Confirming compliance with the Davis-Bacon Act and Section 3 requirements for workforce participation.
- **Environmental Compliance** - Monitoring adherence to National Environmental Policy Act (NEPA) regulations and mitigation measures.
- **Financial Oversight** - Tracking grant expenditures to ensure proper use of funds and cost eligibility under HUD and ADECA guidelines.

Regulatory Compliance

As a federally funded project, the disaster shelter must comply with all applicable HUD, FEMA, and state regulations. The following compliance areas will be enforced throughout the project lifecycle:

- **CDBG-DR National Objectives** - Ensuring that the project meets at least one of HUDs national objectives, such as benefiting low- and moderate-income (LMI) individuals or addressing an urgent community need.
- **Davis-Bacon Act Compliance** - Requiring contractors to submit certified payroll reports to confirm payment of prevailing wages.
- **Section 3 Compliance** - Prioritizing employment and contracting opportunities for low-income residents and local businesses.
- **Procurement and Contracting Compliance** - Adhering to 2 CFR Part 200 procurement standards to ensure fair and competitive bidding.
- **NEPA and Environmental Review Compliance** - Ensuring all environmental impact assessments are completed, including floodplain and wetland considerations.
- **ADA and Accessibility Standards** - Verifying that the shelter meets the Americans with Disabilities Act (ADA) requirements for accessibility.

Financial Oversight and Reporting

Strong financial oversight is essential to maintaining compliance with HUDs CDBG-DR financial management requirements. The following financial monitoring processes will be implemented:

- **Quarterly Performance Reports (QPRs)** - The grant recipient must submit QPRs to HUD detailing project expenditures, milestones, and compliance activities.
- **Drawdown Monitoring** - Ensuring that funds are disbursed only for eligible costs and in accordance with the approved budget.
- **Independent Audits and Internal Controls** - Implementing regular audits to detect and prevent financial mismanagement or fraud.
- **Cost Reasonableness Reviews** - Conducting reviews to ensure that project costs align with market rates and procurement guidelines.

Risk Management and Corrective Actions

A risk management strategy will be implemented to identify potential issues that may affect project compliance. If deficiencies are identified, corrective action plans will be developed to address non-compliance and mitigate risks. Common risks and mitigation strategies include:

- **Construction Delays** - Implementing regular progress monitoring and contingency planning.
- **Financial Mismanagement** - Conducting periodic reconciliations and requiring documentation for all expenditures.
- **Regulatory Non-Compliance** - Providing training for project staff and contractors on CDBG-DR regulations.
- **Labor Violations** - Conducting random site inspections to verify wage compliance and worker safety.

Closeout Process

The closeout process for a disaster shelter project utilizing Community Development Block Grant – Disaster Recovery (CDBG-DR) funding is a critical phase that ensures all project activities have been completed in accordance with federal, state, and local regulations. This phase involves final inspections, certifications, financial reconciliation, reporting to HUD, and transitioning the shelter to operational status. A well-managed closeout process ensures compliance with funding requirements, maximizes project benefits for the community, and mitigates risks of financial or regulatory discrepancies.

At the time of this program guide's preparation, the specific location for the disaster shelter has not been determined. Final site selection will be conducted based on community needs, feasibility studies, and regulatory considerations.

Closeout Process Overview

The closeout process begins when construction activities are substantially complete, and the shelter is ready for final inspections and compliance reviews. This phase involves verifying that all

work was performed as per approved plans, ensuring all financial records are accurate, and securing the necessary certifications to confirm the project meets CDBG-DR and local standards.

The key steps in the closeout process include:

- **Final Documentation and Financial Reconciliation** - All project expenditures must be reviewed and reconciled with approved budgets. This includes verifying contractor payments, grant disbursements, and ensuring cost eligibility under CDBG-DR guidelines. Any remaining unspent funds must be returned or reallocated based on HUD requirements.
- **Final Performance and Compliance Reporting** - A final project performance report must be submitted to HUD, detailing key project achievements, compliance measures, and beneficiary impact. This includes documentation of Davis-Bacon Act wage compliance, Section 3 workforce participation, and adherence to environmental mitigation plans.
- **Grant Closeout Meeting** - Before the project can officially close, a closeout meeting will be conducted with HUD and the state agency administering CDBG-DR funds. This meeting reviews financial statements, audit findings, and compliance reports to ensure all requirements have been satisfied.

Final Inspection Process

Final inspections are a crucial component of project closeout, ensuring that the disaster shelter is built to withstand expected hazards and meets all safety, accessibility, and engineering standards. Inspections will be conducted by state and local regulatory agencies, engineers, and any third-party inspectors required by HUD or FEMA guidelines. The final inspection process includes the following evaluations:

- **Structural Integrity Assessment** - Engineers will verify that all building components, including foundations, roofing, walls, and utility systems, meet local building codes and FEMA's hazard mitigation standards.
- **Accessibility Compliance** - The shelter must comply with the Americans with Disabilities Act (ADA) requirements, ensuring that all facilities are accessible to individuals with disabilities.
- **Environmental and Safety Compliance** - Inspections will confirm that all environmental mitigation measures, such as floodproofing and stormwater management systems, are properly implemented and functional.
- **Emergency Operations Readiness** - The shelter must be equipped with backup power sources, emergency communications systems, and storage for emergency supplies. Functional tests will be conducted to verify these systems are operational.

Certification and Final Approval

Upon successful completion of inspections, various certifications and approvals will be issued to formally close out the project. These include:

- **Certificate of Completion** - This document verifies that all work has been completed in accordance with project specifications and regulatory requirements.
- **Engineer's Certification** - A licensed structural engineer will provide a certification confirming that the disaster shelter meets all construction and safety standards.
- **HUD Compliance Certification** - A final compliance report will be submitted to HUD, demonstrating adherence to all CDBG-DR funding regulations, procurement processes, and labor standards.
- **Occupancy and Operational Approval** - Once all certifications are obtained, the shelter will receive final approval for occupancy and become operational for emergency use.

Long-Term Maintenance and Sustainability

Following project closeout, a long-term maintenance plan will be established to ensure the shelter remains in optimal condition for future disasters. The appropriate local agency or government entity will oversee routine inspections, system maintenance, and updates to emergency preparedness plans. Key components of the maintenance plan include:

- **Annual Safety Inspections** - Regular assessments to identify and address potential structural or operational deficiencies.
- **Emergency Equipment Testing** - Scheduled testing of generators, HVAC systems, and communications equipment to ensure readiness during disasters.
- **Community Training and Drills** - Coordination with emergency response agencies to conduct training sessions and drills to familiarize residents and emergency personnel with shelter operations.

Record Retention

Record retention is a critical component of compliance for the Disaster Shelter project, ensuring that all documents related to project implementation, financial transactions, and regulatory compliance are securely maintained in accordance with HUD's CDBG-DR guidelines. Proper recordkeeping facilitates audits, supports transparency, and protects Mobile County Government against potential compliance risks.

Record Retention Requirements

As a federally funded project, record retention must adhere to the guidelines established in 2 CFR Part 200.333, which require grant recipients to retain all records related to CDBG-DR funding for a minimum of five years from the date of final project closeout unless otherwise specified by HUD or other regulatory agencies. In cases where litigation, audits, or compliance reviews are pending, records must be retained until all legal and financial matters are fully resolved.

Types of Records to be Retained

Mobile County will ensure the preservation of key project records, including but not limited to:

- **Financial Records** - All invoices, receipts, payroll records, cost allocations, and reimbursement requests related to project expenses.
- **Procurement and Contracting Records** - Documentation of bid solicitations, Requests for Proposals (RFPs), contractor selection processes, executed contracts, and performance monitoring reports.
- **Environmental Review Records** - NEPA assessments, environmental impact statements, and any mitigation measures undertaken to ensure compliance.
- **Construction and Engineering Records** - Approved project designs, site inspection reports, change orders, progress reports, and engineer certifications.
- **Compliance Reports** - Davis-Bacon wage reports, Section 3 workforce participation records, Equal Opportunity compliance documentation, and HUD monitoring reviews.
- **Correspondence and Meeting Records** - Official communications with HUD, ADECA, contractors, and community stakeholders, as well as public meeting minutes and presentations.

Record Storage and Accessibility

All records must be securely stored and organized to ensure easy retrieval for audits, monitoring visits, and public inquiries. Mobile County will implement the following record storage policies:

- **Electronic Recordkeeping** - Digital copies of all documents will be stored in a secure, backed-up database with restricted access based on staff roles and responsibilities.
- **Physical Document Storage** - Hard copies of critical documents will be stored in a designated, fireproof storage location within the County's administrative offices.
- **Public Access to Records** - In accordance with the Freedom of Information Act (FOIA), non-sensitive project records may be made available to the public upon request, ensuring transparency while maintaining compliance with privacy laws.

Record Disposal Policy

Upon completion of the mandatory record retention period, Mobile County will follow secure disposal procedures to prevent unauthorized access to sensitive information. Records will be disposed of using the following methods:

- **Paper Document Shredding** - Physical records containing financial, contractual, or personally identifiable information will be securely shredded before disposal.
- **Digital Record Deletion** - Electronic records will be permanently deleted from storage systems following established cybersecurity best practices.

- **Archival of Key Documents** - Select documents, such as project summary reports, legal agreements, and key financial records, may be retained beyond the required period for historical or administrative purposes.

Compliance and Audit Readiness

To ensure ongoing compliance with record retention requirements, Mobile County will conduct periodic internal reviews of its documentation practices. These reviews will help maintain audit readiness and ensure all required records are up to date. In the event of a HUD or external audit, County officials will coordinate with relevant agencies to provide full access to requested documentation and ensure all compliance obligations are met.

Project Toolkit List

- Monthly/Quarterly Report Template