

Mobile County, Alabama

Permanent Generators for Critical Facilities Program Guide



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Executive Summary

The CDBG-DR Permanent Generators for Critical Facilities Program is a disaster recovery initiative funded through HUD's Community Development Block Grant - Disaster Recovery (CDBG-DR) program. This program is designed to enhance community resilience by ensuring critical facilities can maintain operations during and after disasters, addressing vulnerabilities exposed by recent disaster events. By providing funding for the purchase and installation of permanent generators, the program aims to mitigate the risks posed by power outages, safeguard public health and safety, and support essential emergency response functions.

Critical facilities play a vital role in protecting and serving communities during disaster events. Hospitals, emergency shelters, water and wastewater treatment plants, and public safety buildings such as police and fire stations are essential to disaster response and recovery efforts. However, these facilities are often susceptible to prolonged power outages caused by hurricanes, floods, and other disasters. This program addresses these gaps by equipping these facilities with reliable backup power solutions to ensure continuity of operations.

Key program objectives include:

- Enhancing disaster resilience by equipping critical facilities with reliable backup power.
- Meeting HUD's National Objectives, including benefiting low- and moderate-income (LMI) populations, addressing urgent community needs, and eliminating threats to public safety.
- Supporting communities in recovering from and preparing for future disasters by addressing unmet disaster recovery needs.

Through a competitive application process, applicants must demonstrate the need for backup power, the critical role of their facility in disaster response, and the direct connection of their project to the disaster event (disaster tie-back). Awarded applicants will receive funding for the purchase and installment of permanent generators.

Broader Goals of the CDBG-DR program include:

- Focusing on long-term recovery and mitigation.
- Prioritizing projects that benefit vulnerable and underserved communities.
- Supporting sustainable and resilient community development.

The program guide provides comprehensive details on funding availability, eligible applicants and activities, application requirements, project delivery, compliance, and monitoring. This structured approach ensures efficient implementation, accountability, and successful project outcomes.

By providing critical facilities with reliable backup power, this program aims to reduce the risks associated with power outages, protect lives and property, and strengthen community resilience to future disasters.

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 program requirements.

Mobile County Commission

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

General Program Requirements

This program is intended to help communities by providing generators that can be used to supply power to critical facilities during a time of disaster. The overarching goal is to make the community more resilient to a disaster both during and after.

The County seeks to award projects to a diverse range of communities in an effort to not concentrate generators into one singular area. The County would also like to award a variety of facilities allowing for wide range accessibility.

The County will procure a contractor(s) through a Request for Proposal (RFP) process to provide the implementation services to awarded applicants.

All generators must be installed in accordance with all locally adopted and enforced building codes and standards. In the absence of locally adopted or enforced building codes and standards, the requirements of the current Alabama State Building Code will apply.

At the point of application, it is important that the applicant owns or has the rights to the proposed project site.

All project sites, including the building and the generator, must be located outside of the mapped 100-year flood plain. No exceptions will be granted to the 100-year floodplain.

If the project site is located within the 500-year floodplain, all generators must be elevated or floodproofed, in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(2)-(3) or successor standard, to the higher of the 500-year floodplain elevation or three feet above the 100-year floodplain, whichever is higher.

Federal regulations require FEMA National Flood Insurance for all federally funded projects located within a Specific Flood Hazard Area- 100-year floodplain. Insurance will be required prior to work beginning and must be maintained at a minimum through project closeout.

Funding Availability

Funding for this program was allocated by ADECA for non-housing related activities is designed to address the unmet recovery needs following the 2020 Hurricanes and to support projects that build long-term resilience. The program ensures critical facilities have access to reliable backup power, safeguarding public safety and continuity of operations during future disaster events.

Total Program Funding

The Mobile County Commission has allocated \$3,000,000 of their CDBG-DR non-housing funding allocation to this program. The County will award as many applications as possible within the restraints of the allocated funds. Should additional funding become available, the County reserves the right to award projects that were not selected during the initial awarding period.

Eligible Costs

Funding is available and will be used for the following eligible costs:

- Purchase of permanent generators designed to meet the power needs of the critical facilities.
- Site preparation and installation, including, but not limited to electrical connections, structural modifications, and utility hookups.
- Engineering, contractor, and design services related to the generator installation.
- Compliance-related costs, such as environmental reviews and permitting.

Ineligible costs include routine maintenance, operational expenses, temporary generators, and costs incurred before the program start date.

Disbursement of Funds

To ensure the most effective and equitable allocation of CDBG-DR funds, a competitive application process will be implemented. This process will include:

Funding Opportunity: Announce the availability of funds and invite applications from eligible facilities within the designated MID recovery zones.

Application Submission: Provide a standardized application form for applicants to detail their facility's needs, proposed solutions, and anticipated outcomes.

Selection Criteria: Develop clear evaluation criteria, including factors such as the critical nature of the facility, the extent of current backup power inadequacies, the proposed project's impact on community resilience, and the cost-effectiveness of the solution.

Award and Implementation: Notify selected applicants of their awards and provide guidance on project implementation.

Monitoring and Reporting: The County will implement a monitoring system to track project progress, ensure proper use of funds, and document outcomes.

Eligible Applicants

The CDBG-DR Permanent Generators for Critical Facilities Program is designed to ensure that entities responsible for the operation and management of critical facilities have access to funding for permanent generator installation. The program establishes eligibility criteria to ensure resources are directed toward entities with the greatest need and capacity to implement these projects effectively.

Eligible applicants include entities responsible for owning, managing, or operating critical facilities that provide essential services to the community during and after disasters. These entities include:

- **Local Governments:** Counties, municipalities, and other local government entities with jurisdiction over critical facilities.
- **Special Purpose Districts and Authorities:**
 - Public Utility Authorities
 - Fire Protection Districts
 - Emergency Services Districts
- **Non-Profit Organizations:**
 - Non-profits that operate facilities directly supporting disaster response and recovery efforts, such as emergency shelters or health clinics.
 - Organizations must provide documentation of their 501(c)(3) status.
- **State Agencies:** State-level entities that own or operate eligible critical facilities within the designated disaster area.
- **Tribal Governments:** Federally recognized tribal governments operating critical facilities.

Eligibility Requirements

Applicants must meet the following criteria to qualify for program funding:

- **Disaster Impact:**
 - The facility must demonstrate a direct tie-back to the disaster event (e.g., service disruptions, documented impacts, or increased vulnerabilities caused by the disaster).
 - Applicants must provide evidence of unmet needs related to backup power for disaster recovery and response.
- **Ownership or Responsibility:**
 - Applicants must own, lease, or have operational responsibility for the facility.
 - For leased facilities, the applicant must provide a lease agreement demonstrating control over the property and permission to install permanent generators.
- **Capacity to Maintain:**
 - Applicants must submit a plan for generator maintenance and operation over the long term.

Ineligible Applicants

The following entities are not eligible to apply for funding under this program:

- **Private, For-Profit Entities:** Businesses or corporations, including private operators of facilities, are ineligible unless specifically approved by HUD as part of the program design.
- **Individuals:** Private homeowners or individuals are not eligible.
- **Facilities Outside the Disaster Impact Area:** Entities operating facilities not located within the area designated for CDBG-DR assistance are ineligible.
- **Entities with Outstanding HUD Compliance Issues:** Applicants with unresolved findings from previous HUD-funded programs or non-compliance with HUD regulations are disqualified until such issues are resolved.

Ineligible Facilities

Publicly owned and nonprofit facilities are eligible for program funding as long as they are not used for the general conduct of government. The following facilities are not eligible for funding:

- City halls
- Government administrative buildings
- Casinos

Additional Eligibility Considerations

The following additional factors may influence eligibility or prioritization:

- Facilities Serving Low- and Moderate-Income (LMI) Areas:
 - Facilities serving populations in areas meeting HUD's LMI criteria will be given priority.
 - Documentation of service to LMI populations must be included in the application.

National Objective and Disaster Tieback

National Objective

This program is designed to meet Low- to Moderate-Area (LMI) Area Benefit standard at 24 CFR 570.483(b)(1) or Urgent Need pursuant to 24 CFR 570.483(d). The Urgent Need (UN) National Objective will only be used when an LMI National Objective cannot be achieved through the project.

The County will give preference to applications that service the LMI and other disadvantaged populations over projects only meeting the UN National Objective.

Disaster Tieback

Mobile County has been designated as one of the Hardest Hit Most Impacted and Distressed (HHMID) counties. This program addresses the unmet needs tied to the 2020 hurricane disasters by providing generators to critical facilities throughout the county. Following the disasters, prolonged power outages resulted in the loss of food and medication for families, and the lack of power in critical facilities hindered the efficiency of communications and public services.

Application For Funding

The CDBG-DR Permanent Generators for Critical Facilities Program requires a structured application for funding process to ensure fair, transparent, and efficient allocation of funds to eligible applicants. This section outlines the steps, requirements, and necessary documentation for submitting a completed application for funding.

Application Process Overview

The application for funding process consists of two main stages:

1. Notice of Funding Availability (NOFA): The County will issue a NOFA to inform potential applicants about funding availability, eligibility requirements, and submission deadlines. The NOFA will be published on the County's CDBG-DR website and distributed through the relevant channels as outlined in their CPP.
2. Application for Award: Eligible applicants must submit a complete application with all required documentation by the deadline specified in the NOFA.

Application Submission Requirements

Applicants must adhere to the following requirements when submitting their application(s):

- **Submission Deadline:** Applications must be submitted by the deadline indicated on the NOFA. Late submissions will not be considered for funding.
- **Submission Format:** Applications may be submitted online via email or in the designated system (as specified in the NOFA).
- **Contact Information:** A designated contact person must be identified in the application, including their name, title, email and phone number.

Application Components

A completed application must include the following components:

- **Application Form:** Standardized form provided by the County. This form collects basic information about the applicant, the facility, and the proposed project.
- **Project Narrative:** A detailed description of the project including:
 - Overview of the facility and its critical role in disaster response and recovery.
 - Description of how the project addresses unmet needs and enhances resilience.
 - Justification for the generator's size and capacity based on facility needs.
- **Disaster Tie-Back Documentation:** Evidence that the proposed project is directly related to the disaster for which the CDBG-DR funds were allocated. Examples include, but are not limited to:
 - FEMA and/or insurance claims.
 - Documentation of power outages or operational disruptions during and post the disaster.
- **Facility Information:** Details about the critical facility including but not limited to:
 - Facility name, location, and ownership status.
 - Current operational use and populations served.
 - Documentation of the facility's designation as a critical facility, if applicable.
- **Proof of Eligibility:** Required documentation based on the eligibility section, including but not limited to:
 - Proof of ownership or operational responsibility.
 - Evidence of non-profit status (if applicable).
- **Maintenance Plan:** A plan outlining how the generator will be maintained and operated after installation, including funding sources for long-term maintenance.
- **Local Government Authorization:** A resolution or letter of support from the local governing body approving the application submission.
- **Additional Supporting Documents:**

- Photos of the facility.
- Additional documentation specified in the NOFA.

Required Applicant Documentation

To demonstrate eligibility, applicants must submit the following documentation as part of the application:

- Proof of Ownership or Operational Responsibility:
 - Deeds, lease agreements, or other documentation proving control of the facility.
- Evidence of Disaster Impact:
 - FEMA disaster claims, insurance reports, or photos of facility damage tied to the disaster.
- Non-Profit Status (if applicable):
 - IRS determination letter verifying 501(c)(3) status.
- Local Government Authorization:
 - Resolution or authorization from the governing body approving the application submission.
- Maintenance Plan:
 - Comprehensive description of maintenance following the installation and program closeout.

Application Review Process

The review process will allow applications to be evaluated fairly and in alignment with program priorities.

- Initial Screening: Program staff with the County will review each application to determine that it is complete and all required information has been provided.
- Scoring Criteria: Following the initial screening, program staff will then use the outlined scoring criteria to determine the comprehensiveness of the application provided. Once all documentation has been reviewed, a score will be provided to the projects based on the ranking scale for each criteria area. Scoring criteria may include:
 - Project Area's LMI Percentage
 - Public Accessibility
 - Community need and proof of unmet need
 - Outside of the 500-year floodplain
- Preliminary Inspection: Program staff will conduct a preliminary on-site inspection of the project site. This visit will be used to assess the feasibility of the project and to determine if the scope of work provided in the application is appropriate.

Notifications and Next Steps

- **Award Notifications:** The County will review the final package from the Application Review Process that has been conducted. Once approved, a notice of intent to award will be provided to the applicant outlining next steps.
- **Non-Award Notifications:** If an application is found to not be sufficient and not recommended for an award, a Non-Award Notification will be generated and provided to the applicant. If the applicant has outstanding questions, they may request a technical assistance meeting with the County.

Post Award Process

Award Notification and Memorandum of Understanding (MOU)

After the application review and approval process, awarded applicants will be notified of their award. This process involves several steps as outlined below:

- **Award Notification:**
 - Awardees will receive a formal award letter, including:
 - Summary of approved project scope.
 - Required next steps and deadlines.
- **Memorandum of Understanding (MOU) Execution:**
 - The County will prepare a MOU outlining:
 - Terms and conditions.
 - Roles and responsibilities of both the beneficiary and the County.
 - Federal and programmatic compliance requirements.
 - Recipients must review, sign, and return the agreement to initiate the funding process.

Pre-Construction Approvals

Prior to the release of funds, the County will fulfill the following requirements:

- **Environmental Review Compliance**
 - The County will conduct an Environmental Review compliant with NEPA and HUD environmental review requirements (e.g. statutory requirements),
 - HUD/ADECA will issue the Authority to Use Grant Funds (AUGF) upon successful completion.
- **Procurement Process Approval**
 - The County will conduct all procurement activities compliant with HUD regulations (e.g., 2 CFR Part 200) and include:
 - Competitive bidding process.

- Procurement documentation (e.g., requests for proposal, bid evaluations, and contracts).
- Permitting and Site Preparation:
 - Awardees must provide evidence of necessary permits and site readiness for generator installation.
- Project Schedule and Milestones:
 - The County will develop a detailed project timeline, including key milestones (e.g., design, installation, inspections).

Coordination and On-going Communication to promote transparency, accountability, and open communication with awardees and ADECA the County will provide:

- Communication Coordination
 - On-going communication with awardees during the design and installation phases to ensure awareness and coordination.
- Progress Reports
 - Regular reports (e.g., quarterly) detailing project progress, challenges, and expenditures.
 - Reports may include photos and a narrative detailing the completed work and the work to be completed
- Compliance:
 - The County must adhere to HUD regulations (e.g., Davis Bacon labor standards, if applicable).

Finalization of Project Installation

Upon successful completion of the project:

- The County will complete a **Project Completion Certificate**.
- The County will transition the finalized project to the awardee to begin maintaining and operating
- All awardees will be required to attend training on the maintenance and operation of the generators. This training will be conducted by the general contractor and once completed a Maintenance and Operation Certificate/ Certification will be obtained.
- Following the completion of the project, the County will coordinate on project closeout with ADECA, and the required documentation needed for HUD'S Disaster Recovery Grant Reporting System (DRGR).

General Program Cross-Cutting Requirements







Procurement

Procurement will be required for the purchase and installation of a generator. This is recommended through an RFP and contract. All subrecipients 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 HUD's 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

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

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 the 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 the HUD OIG.







Monitoring and Compliance

The County will conduct on-going monitoring and compliance checks with their procured contractor to ensure both state and federal requirements are being 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.

Closeout Process

Final Inspection and Certification

Following the completion of installation, a final inspection will be required for the installation of the generator. The inspector will verify that the generator has been installed according to the approved specifications. The key criteria to be inspected includes but is not limited to:

	Generators model and capacity		Proper ventilation and clearance
	Electrical connections		Automatic transfer switch operation
	Fuel supply (e.g. propane or natural gas)		Overall functionality and safety

Inspection Report

The inspector will document the findings of the inspection in a detailed report. If the project passes the inspection, the report will recommend certification. However, if any issues are identified, the report will outline the needed corrective measures.

Certification Documentation

A Certification of Completion will be provided to the subrecipient for their project file. The Subrecipient will need to provide a copy of the Certification of Completion to the County to maintain in their program project file.

Submission of Closeout Documentation

Following the issuance of the Certification of Completion, the project will be considered officially completed. At this time, the County will coordinate the closeout phase for the project with ADECA. ADECA will request the submission of project documentation.

Record Retention

To remain consistent with HUD requirements, the County must maintain records for at least five years following the closeout of ADECA's CDBG-DR grant with HUD.

Program Toolkit List

- Application for funding
- Application scoring matrix
- Contractor RFP
- Certification of Completion Form
- Maintenance and Operation Certificate/ Certification