HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and Anti-displacement and Relocation Plan --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.

Signature of Authorized Official

3/27/23

Date

President, Mobile County Commission Title

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

- Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
- 2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to:

 (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352)
 which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C.§§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation

Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

- 7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- 8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

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Standard Form 424B (Rev. 7-97) Prescribed by OMB Circular A-102

- Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
- 10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

- Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
- 14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
- 15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
- 16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
Connie Budson	President, Mobile County Commission
APPLICANT ORGANIZATION	DATE SUBMITTED
Mobile County Commission	03/27/2023

Standard Form 424B (Rev. 7-97) Back

ASSURANCES - CONSTRUCTION PROGRAMS

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NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant:, I certify that the applicant:

- Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- 3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
- 4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- 5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
- 6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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- 11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
- Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
- 14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

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- Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
- Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
Conniedudoon	President, Mobile County Commission
APPLICANT ORGANIZATION	DATE SUBMITTED
Mobile County Commission	03/27/2023

SF-424D (Rev. 7-97) Back

View Burden Statement

Application for Federal Assistance SF-424					
* 1. Type of Submissi	ion:	* 2. Type of Application:	* lf	Revision, select appropriate letter(s);	
Preapplication		X New			
X Application		Continuation	*0	Other (Specify):	
Changed/Corre	ected Application	Revision			
* 3. Date Received:		4. Applicant Identifier:			
		AL 19097 Mobile Cour	nty	7 (UOG)	
5a. Federal Entity Ide	entifier:			5b. Federal Award Identifier:	,
				M-21-UP-01-0206	
State Use Only:	······				
6. Date Received by	State:	7. State Application	Ide	antifier:	
8. APPLICANT INFO	ORMATION:				
* a. Legal Name: Mo	obile County C	commission	_		
* b. Employer/Taxpay	/er Identification Nur	mber (EIN/TIN):	T .	* c. UEI:	
63-6001644				YNN6QEMH9UF9	
d. Address;			<u></u>		
* Street1:	205 Government	t Street	_		
Street2:			<u> </u>		
	Mobile				
County/Parish:					
* State:	AL: Alabama]
Province:					•
* Country:	USA: UNITED S	TATES]
* Zip / Postal Code:	36644-0001		_		
e. Organizational U	nit:				
Department Name:			. []	Division Name:	
Grants Departme	ent		Ш		
f. Name and contac	t information of pe	erson to be contacted on m	att€	ers involving this application:	
Prefix: Mr.		* First Name	e:	James	
Middle Name: Gord	don				
* Last Name: Bauer					
Suffix:					
Title: Grants Adm	inistrator				
Organizational Affiliati	ion:				<u> </u>
* Telephone Number:	Telephone Number: 251-574-8099 Fax Number:				
*Email: gordon.ba	auer@mobilecou	intyal.gov			

Application for Federal Assistance SF-424
* 9. Type of Applicant 1: Select Applicant Type:
B: County Government
Type of Applicant 2: Select Applicant Type:
Type of Applicant 3; Select Applicant Type:
* Other (specify):
* 10. Name of Federal Agency:
Department of Housing and Urban Development
11. Catalog of Federal Domestic Assistance Number:
14.239
CFDA Title:
HOME Investment Partnerships Program
* 12. Funding Opportunity Number:
N/A
* Title:
N/A
13. Competition Identification Number:
N/A
Title:
N/A
14. Areas Affected by Project (Cities, Counties, States, etc.):
Add Attachment Dekate Anactonemt View Attachment
* 15. Descriptive Title of Applicant's Project:
Proposed HOME-ARP activities to be undertaken: Supportive Services, Construction of Rental Housing, and Program Administration
Attach supporting documents as specified in agency instructions.
Add Attachments Delete Attachments View Attachments

Application for Federal Assistance SF-424
16. Congressional Districts Of:
* a. Applicant 1 * b. Program/Project 1
Attach an additional list of Program/Project Congressional Districts if needed.
Add Attachment Delete Attachment View Attachment
17. Proposed Project:
* a. Start Date: 06/01/2023 * b. End Date: 09/30/2030
18. Estimated Funding (\$):
*a. Federal 2,190,303.00
* b. Applicant
* c. State
* d. Local
* e. Other
* f. Program Income
* g. TOTAL 2,190,303.00
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?
a. This application was made available to the State under the Executive Order 12372 Process for review on
b. Program is subject to E.O. 12372 but has not been selected by the State for review.
x c. Program is not covered by E.O. 12372.
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)
Yes X No
If "Yes", provide explanation and attach
Add Attachment Delete Attachment View Attachment
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)
X ** I AGREE
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.
Authorized Representative:
Prefix: Mrs. * First Name: Connie
Middle Name:
* Last Name: Hudson
Suffix:
* Title: President, Mobile County Commission
* Telephone Number: 251-574-2000 Fax Number:
* Email: district2web@mobilecountyal.gov
* Signature of Authorized Representative: Connected and Co

Mobile County Commission Notice of Comment Period And Public Hearing – 2021 Substantial Amendment for HOME-ARP Allocation Plan

The purpose of this notice is to solicit citizens' comments and to give notice of a public hearing and public comment period regarding the proposed amendment to the Mobile County Urban County PY2021 Action Plan to add the HOME-ARP Allocation Plan.

The Public Hearing will be held prior to final adoption by the Mobile County Commission at the regular County Commission meeting to be held at 10:00 a.m. on March 9, 2023, in the assembly room, located on the ground floor of the Mobile Government Plaza, at 205 Government Street in Mobile, Alabama.

Proposed amendment:

HUD requires the developed of a HOME-ARP Allocation Plan as a substantial amendment to the PY2021 Annual Action Plan. The Plan assesses the needs of HOME-ARP qualifying populations and describes how the County's \$2,190,303 allocation of HOME-ARP funds will be used to meet those needs. HOME-ARP funds may be used to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter. Based on the needs assessment and community consultation, the County's proposed uses of funds are set forth in the draft HOME-ARP Allocation Plan being made available for public comment.

A complete and detailed copy of the HOME-ARP Allocation Plan will remain on file at the offices of the Mobile County Commission and will be available for public examination and copying upon request at the Mobile County Government Plaza, 205 Government Street, Mobile, Alabama between the hours of 9:00 a.m. and 4:00 p.m. Monday through Friday, excluding holidays. The proposed HOME-ARP Allocation Plan is also available on the County web page at <u>https://www.mobilecountyal.gov/grants/plans-policies-amendments/</u>.

A 15-day public comment will commence beginning March 1, 2023 until March 16, 2023. Written comments are to be sent to Director of Grants Management, Mobile County Commission, 205 Government Street, Mobile, AL 36644.

The public hearing will be accessible to all. If you have a disability which may require special materials or assistance, please notify the Grants Department at (251) 574-8099 at least 3 working days prior to the hearing. Mobile County Commission does not discriminate on the basis of race, age, sex, national origin, religion or disabilities and is an equal opportunity employer.

Spanish translation and/or clarification will be provided upon request: please call Grants Department at (251) 574-8099. La traducción y/o la clarificación española serán dados si hay solicitad, Llame por favor Grants Department (251) 574-8099.

Connie Hudson, President

Mobile County Commission

Instructions to Newspaper: Instructions to Webmaster: Publish as legal ad on February 19, 2023 Publish on Grants page on February 19, 2023



Press Register

Total

LEGAL AFFIDAVIT

AD#: 0010580499

\$150.94

State of Alabama,) ss

County of Mobile)

Catherine Copas being duly sworn, deposes that he/she is principal clerk of Alabama Media Group; that Press Register is a public newspaper published in the city of Mobile, with general circulation in Mobile County, and this notice is an accurate and true copy of this notice as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following date(s):

Press Register 02/19/2023

Principal Clerk of the Publisher

Sworn to and subscribed before me this 21th day of February 2023

Notary Public

Mobile County Commission Notice of Comment Period And Public Hearing – 2021 Substantial Amendment for HOME-ARP Allocation Plan

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Connie Hudson, President Mobile County Commission

PRESS REGISTER February 19, 2023







HOME-ARP Allocation Plan

Mobile County has been allocated HOME-ARP funds through the U.S. Department of Housing and Urban Development. HOME-ARP funds assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing assistance to increase housing stability This plan outlines the County's intended uses of HOME-ARP funds to achieve these outcomes.

Contents

1.		Executive Summary4
2.		Consultation
	A.	Process
	В.	Organizations Consulted8
	C.	Summary of Feedback Received12
3.		Public Participation
	A.	Process
	Da	te of Public Notice:
	Pu	blic Comment Period:14
	Da	te of Public Hearing:
	В.	Efforts to Broaden Public Participation14
	C.	Comments and Recommendations Received15
	D.	Comments or Recommendations Not Accepted15
4.		Needs Assessment and Gaps Analysis15
	A.	Size and Demographic Composition of Qualifying Populations15
	Но	meless Individuals, as defined in 24 CFR 91.516
	At	Risk of Homelessness, as defined in 24 CFR 91.519
	Fle	eing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the HOME-ARP Notice25
	Ot	her Populations Requiring Services or Housing Assistance to Prevent Homelessness and Other
	Oti	Populations at Greatest Risk of Housing Instability, as defined by HUD in the HOME-ARP Notice27
	Β.	Current Resources Available to Assist Qualifying Populations
	Со	ngregate and Non-Congregate Shelter Units
	Su	oportive Services
	Sei	vices for those Fleeing, at Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking
	Sei	vices for Veterans
	Sei	rvices for Opioid Overdose and Addiction
	Te	nant Based Rental Assistance
	Aff	ordable and Permanent Supportive Rental Housing33

C. Unmet Housing and Service Needs of Qualifying Populations	35
Homeless Populations, as defined in 24 CFR 91.5	35
At Risk of Homelessness, as defined in 24 CFR 91.5	36
Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Sta Trafficking, as defined by HUD in the Notice	-
Other Populations Requiring Services or Housing Assistance to Prevent Homelessness Populations at Greatest Risk of Housing Instability, as defined by HUD in the HOM	
Mental Health Services	
Veteran Housing and Supportive Services Needs	
D. Gaps within Current Shelter and Housing Inventory and Service Delivery Systems	
E. Additional Characteristics Associated with Instability and Increased Risk of Homeles	sness40
F. Identify Priority Needs for Qualifying Populations	40
G. Determination of Level of Need and Gaps in Shelter and Housing Inventory and Systems	-
5. HOME-ARP Activities	41
A. Method(s) of Selection	41
B. Direct Administration by PJ	42
C. No Use of Subrecipient	43
D. Use of HOME-ARP Funding	43
Distribution of HOME-ARP funds In Accordance with Priority Needs	44
Rationale Funding Based on Characteristic Needs Identified in the Gap Analysis	44
6. HOME-ARP Production Housing Goals	45
A. Estimated Number of Affordable Rental Housing Units for Qualifying Populations	45
B. Rental Housing Production Goals and Correspondence with Need	45
7. Preferences	45
A. Identification of Preference	45
B. Using Preference to Address Unmet Need	46
8. Referral Methods	46
9. Limitations in a HOME-ARP Rental Housing or NCS Project	46
10. HOME-ARP Refinancing Guidelines	47
APPENDIX A – SUMMARY OF SURVEY RESULTS	48

APPENDIX B – PUBLIC NOTICES	49
APPENDIX C – Certifications and SF-424s	50

1. Executive Summary

The American Rescue Plan of 2021 (ARP), also called the COVID-19 Stimulus Package, Pub.L. 117– 2 (March 11, 2021) provides \$5 billion to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability across the country. These grant funds will be administered through HUD's HOME Investment Partnerships Program (HOME) and are known as HOME-ARP funds. Eligible HOME-ARP activities include acquisition and development of non-congregate shelter, tenant based rental assistance, supportive services, HOME-ARP rental housing, administration and planning, and nonprofit operating and capacity building assistance. A certain portion of HOME-ARP funds must assist people in HOME-ARP "qualifying populations," which include:

- Sheltered and unsheltered homeless populations, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a));
- Those currently housed populations at risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act (42U.S.C. 113060(1)).
- Those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking.
- Other families requiring services or housing assistance or to prevent homelessness.

In September 2021, HUD announced that Mobile County will receive \$2,190,303 in HOME-ARP funds. This supplemental funding was allocated by formula under the HOME entitlement program. To receive the HOME-ARP allocation, the County must develop a HOME-ARP Allocation Plan that will become part of the State's FY 2021 HUD Annual Action Plan by substantial amendment. The Allocation Plan includes 1) an outline of the consultation and public participation processes undertaken, 2) an assessment of the needs of qualifying populations and gaps in local housing and services systems, and 3) planned uses of HOME-ARP funds for prioritized populations and eligible activities.

To ensure broad input into the HOME-ARP Allocation Plan from stakeholders and the public, the County engaged in consultation with stakeholders and the public, including an online survey, virtual consultation sessions, direct contact with HUD-required organizations that did not participate in a virtual session, a 15-day public comment period, and a public hearing. The needs assessment and gap analysis identified the following needs and gaps that may be addressed using HOME-ARP funds:

- A 2022 Point-in-Time (PIT) count found a total of 585 persons experiencing homelessness in the Mobile City and County / Baldwin County Continuum of Care. Of those, a total of 388 persons (66%) were unsheltered.
- Households earning between 0-30% of AMI are more likely to be cost-burdened; pay more than 30% of their income towards housing expenses making them at risk for homelessness. Among all renters in Mobile County who are cost burdened, 72% earn below 50% of AMI (a total of 17,750 households).
- Emergency rental and utility assistance distribution totals reflect a scale of housing insecurity in the County that persists beyond the COVID-19 pandemic. According to data reported to the U.S. Treasury, Mobile County distributed \$19,268,041 in COVID-19 emergency rental assistance in a program that assisted 4,066 households. The amount of application demand (10,290 received for the program) indicates sustained need for households that persists beyond the pandemic.
- The Household Pulse Survey measures the percentage of adults in households not current on rent or mortgage payments. Statewide data can be used to form a rough approximation for the number of housing insecure households: approximately 12,000 households that lack confidence in their ability to make a rent or mortgage payment and 4,800 households that (as of December 2022) view eviction as very likely or somewhat likely.¹
- The County has increasingly high rents and historically low vacancy rates, and an acute shortage of affordable units. Rents have increased by 28% from December 2020 to December 2022 and vacancy rates have fallen as low as 3.5% during this period. The

¹ Please note: Because local Household Pulse Survey estimates are not available for Mobile county, these totals are estimates formed by prorating Alabama statewide totals to Mobile County's share of the state's overall population. These estimates are based on local data and data from counties across the state.

State of Alabama faces an estimated shortfall of more than 76,000 affordable housing units.

To address these needs and gaps, the County will utilize HOME-ARP funds for affordable rental housing development and supportive services to address increasing demands for affordable units and support for vulnerable populations.

2. Consultation

A. Process

Describe the consultation process including methods used and dates of consultation.

In developing this Allocation Plan, the County conducted a diverse outreach strategy to engage the community and stakeholders through three methods. An online survey was published in English and Spanish, a series of three virtual community meetings were held, and direct one-onone outreach to stakeholders was conducted to collect specific information around needs of qualifying populations. This section summarizes the consultation efforts made by the County.

The County's HOME-ARP Community Needs Survey was open from January 11, 2023 – February 3, 2023. The survey was made available in English and Spanish and received a total of 187 responses. A summary of the results is attached as Appendix A. The survey explored issues of fair housing, housing affordability, and the needs of those experiencing homelessness, at risk of homelessness, and other vulnerable populations. When asked about the greatest housing needs that can be addressed with HOME-ARP funds, 87.7% of respondents said production of new housing units was very important, 81.8% said supportive services, homelessness prevention services, and housing counseling was very important, 84% said preservation of existing housing was very important, 71.1% said tenant based rental assistance was very important, and 68.4% said expanding non-congregate shelter opportunities was very important. When asked about priorities for services for those experiencing homelessness, those at risk of homelessness, and other vulnerable populations, respondents selected case management services, supplemental food assistance, mental health services, and outreach services as very important. Written responses to an open-ended question asking about community needs for qualifying populations contained themes related to transportation, location of services, emergency shelters, mental health and substance abuse services, vocational training and education, and home repairs.

The County also held a series of three community meetings to solicit input and consult with key stakeholders that serve and support the qualifying populations identified in the HOME-ARP guidance issued by HUD in September 2021. At these meetings, the County provided an overview of HOME-ARP, reviewed the eligible qualifying populations, discussed the eligible uses of funds identified within the guidance provided by HUD, and described the required components of the HOME-ARP allocation plan including the process and anticipated timeline for submitting the plan. During the sessions, the County solicited questions, comments, and feedback about the eligible uses of funds through an interactive dialogue. Notice of the meetings was posted to the County's website on January 11, 2022, and invitations were sent to 48 stakeholders throughout the County. Registration was requested for attendance and the total number of registrants is listed below along with the total number of individuals in actual attendance. Overall themes in the meetings included lack of affordable housing options for residents, greater

Meeting Date	Meeting Topic	Registrants	Attendees
January 18, 2023 2 pm MT	Homelessness and Special Needs	10	10
January 19, 2023 1 pm MT	Housing	14	15
January 19, 2023 4 pm MT	Community Services	10	11

Overall themes in the meetings are summarized below:

Homelessness and Special Needs: Feedback from this meeting primarily focused on the need for increased access to transportation, the development or preservation of affordable housing units, housing and services for those fleeing domestic violence and sex trafficking, home repair assistance, navigation services, services that increase self-sufficiency (job training, access to employment, financial education, etc., and wraparound support services – primarily mental health and substance abuse.

Affordable Housing: Feedback from this meeting primarily focused on the need for the development of or preservation of more quality affordable housing units, utility assistance, housing navigation services, housing for those fleeing domestic violence and sex trafficking, accessible housing for those with disabilities, mental health services, and Fair Housing education and advocacy.

Community Services: Feedback from this meeting primarily focused on the need for increased access to reliable transportation, mental health services, dental services, utilities assistance, access to job education and training, and case management services. It was also noted that there is a need for housing and services for those fleeing human trafficking and veterans with children. A conversation about collaboration resulted in the idea of creating a more streamlined intake and referral process.

Finally, the County had one-on-one meetings with stakeholders to further explore the needs of those experiencing homelessness, those at risk of homelessness, and other vulnerable populations. Invitations for interviews were sent to 18 stakeholders and the overall themes from these conversations include the need for more affordable rental housing for all, a lack of wrap around services that meet people where they are and set people up for sustainable, long-term success, and a need for more shelter space, especially for single men. Stakeholders discussed the success of collaboration of service providers across the County, and they expressed interest in ensuring HOME-ARP funds are used to leverage these successes.

B. Organizations Consulted

		If a Service Provider,	
		Qualifying Population	
Agency/Organization	Type of Organization	Served	Method of Consultation
		Homeless, At Risk of	
		Homelessness,	
		Vulnerable	
AIDS Alabama	Non-profit	Populations	Survey Invitation
Boys and Girls Clubs of South			
Alabama	Non-profit	Youth	Survey Invitation
			Survey Invitation,
Center for Fair Housing	Non-profit	Fair Housing	Stakeholder Interview
		Homeless, At Risk of	
		Homelessness,	
		Vulnerable	
		Populations, Seniors,	Survey Invitation,
Chickasaw Housing Authority	Public Housing Authority	Disabilities	Stakeholder Interview

List organizations consulted.

City of Bayou La Batre	Local Government	N/A	Survey Invitation
City of Chickasaw	Local Government	N/A	Survey Invitation
City of Citronelle	Local Government	N/A	Survey Invitation
City of Creola	Local Government	N/A	Survey Invitation
			Survey Invitation,
			Registered for
City of Prichard	Local Government	N/A	community meeting
City of Saraland	Local Government	N/A	Survey Invitation
City of Satsuma	Local Government	N/A	Survey Invitation
City of Semmes	Local Government	N/A	Survey Invitation
		Homeless, At Risk of Homelessness, Vulnerable Populations, Seniors, Youth, Disabilities,	
Homeless Coalition of the		Fleeing Domestic	Survey Invitation,
Alabama Gulf Coast	Continuum of Care	Violence, Veterans	Stakeholder Interview
Housing First, Inc.	Non-Profit	Homeless, At Risk of Homelessness, Vulnerable Populations, Veterans	Survey Invitation, Stakeholder Interview
Dumas Wesley	Non-profit	Homeless, At Risk of Homelessness, Youth, Vulnerable Populations, Seniors	Survey Invitation, Registered for community meeting, Stakeholder Interview
		Homeless, At Risk of	
Family Promise	Non-profit	Homelessness	Survey Invitation
Foster Grandparents	Advocacy	Seniors	Survey Invitation
		Vulnerable	
Franklin Primary Health Center	Healthcare, Non-profit	Populations	Survey Invitation

Non-profit Legal Services	Homelessness	community meeting, Stakeholder Interview
· · · · · · · · · · · · · · · · · · ·		Stakeholder Interview
Legal Services	Vulnerahle	
Legal Services	Vallerable	Survey Invitation,
	Populations	Stakeholder Interview
		Registered for
	Vulnerable	community meeting,
Healthcare	Populations	Stakeholder Interview
		Registered for
Housing Developer	N/A	community meeting
Religious Organization	Vulnerable	
Coalition	Populations	Survey Invitation
		Registered for
Public Agency	N/A	community meeting
		Registered for
Public Agency	Vulnerable Populations	community meeting
		Registered for
Public Agency	Vulnerable Populations	community meeting
Public Agency	Vulnerable Populations	Survey Invitation
	Homeless, At Risk of	
	Homelessness,	
	Vulnerable	
	Populations, Seniors,	Survey Invitation,
Public Housing Authority	Disabilities	Stakeholder Interview
	Homeless, At Risk of	
	Homelessness,	
	Vulnerable	
	Populations, Seniors,	Registered for
Public Housing Authority	Disabilities	community meeting
	Housing Developer Religious Organization Coalition Public Agency Public Agency Public Agency Public Agency Public Agency Public Agency	HealthcareVulnerable PopulationsHousing DeveloperN/AReligious Organization CoalitionVulnerable PopulationsDublic AgencyN/ADublic AgencyVulnerable PopulationsDublic AgencyHomeless, At Risk of Homelessness, Vulnerable Populations, Seniors, DisabilitiesPublic Housing AuthorityHomeless, At Risk of Homelessness, Vulnerable Populations, Seniors, Disabilities

	Homeless. At Risk of	
	Vulnerable	
	Populations, Seniors,	Survey Invitation,
Public Housing Authority		Stakeholder Interview
Healthcare	Vulnerable Populations	Survey Invitation
	Homeless, At Risk of	Registered for
Non-profit	Homelessness	community meeting
	At Risk of	
	Homelessness,	
	Vulnerable	
	Populations, Fleeing	Survey Invitation,
Non-profit	Domestic Violence	Stakeholder Interview
	Homeless, At Risk of	
	Homelessness,	
	Vulnerable	
	Populations, Seniors,	Survey Invitation,
Public Housing Authority	Disabilities	Stakeholder Interview
Non-profit	Seniors	Survey Invitation
Non-profit	Vulnerable Populations	Survey Invitation
Non-profit	Seniors	Survey Invitation
Local government	N/A	Survey Invitation
		Survey Invitation,
Advocacy	Youth	Stakeholder Interview
	Homeless, At Risk of	
	Homelessness,	
Non profit	Vulnerable Populations	Survey Invitation
Non-pront		
	Non-profit Non-profit Non-profit Public Housing Authority Non-profit Non-profit Non-profit Local government	Public Housing AuthorityPopulations, Seniors, DisabilitiesHealthcareVulnerable PopulationsNon-profitHomeless, At Risk of HomelessnessNon-profitAt Risk of Homelessness, Vulnerable Populations, Fleeing Domestic ViolenceNon-profitHomeless, At Risk of Homelessness, Vulnerable Populations, Seniors, DisabilitiesPublic Housing AuthoritySeniorsNon-profitSeniorsNon-profitSeniorsNon-profitSeniorsNon-profitSeniorsAdvocacyYouthHomeless, At Risk of Homelessness,

		Homeless, At Risk of	
United Way of Southwest		Homelessness,	Registered for
Alabama	Non-profit	Vulnerable Populations	community meeting
			Registered for
			community meeting;
Veterans Recovery Resources	Non-profit	Veterans	Stakeholder interview
VIA Senior Services	Non-profit	Seniors	
		Homeless, At Risk of	
		Homelessness,	
		Vulnerable	
		Populations,	Registered for
		Disabilities, Homeless	community meeting,
Volunteers of America	Non-profit	Youth, Seniors	Stakeholder Interview

C. Summary of Feedback Received

Summarize feedback received and results of upfront consultation with these entities

Largely, the public and stakeholders agreed that the needs lie in accessing more affordable housing units and providing services that can address case management and assist vulnerable populations.

Multiple providers mentioned a lack of decent, safe, and sanitary units being available for rent by at-risk and homeless households. Affordable housing options are limited in many parts of Mobile County, and the cost of entering housing (deposits, first and last, etc.) is prohibitive. Many units are substandard and there is a need to sustain existing stock. Property owners are not accepting rental vouchers, and most providers mentioned large increases in rents as a barrier for homeless, at-risk households and veterans. Some providers have aging units over 25 years old and need rehabilitation. There is concern about a rental assistance "cliff" occurring once federal rental assistance stimulus funds run out. Because of this, there is a potential need to mix housing prevention with landlord incentives to avoid evictions. In all cases, there is an expressed need to develop new rental housing with long-term services for homeless households. In rural areas of the county, health care can be inaccessible for veterans. Rural areas also have a need for decent affordable housing options, as the market is outpacing the working poor and overall housing quality is substandard. Several providers mentioned 'Not in my Backyard" (NIMBY) issues for new rental development and recommend using existing public and private buildings for rental development, in lieu of land acquisition and development.

Various shelter needs were also noted. Several providers expressed concern that Coordinated Entry (CE) for the area Continuum of Care (CoC) is not fast enough, with 1-2 weeks waiting periods from client intake to assessment and placement into housing and services. The area has only one family shelter, with none for single-parent families, homeless men or disabled persons. There is also a need for a domestic violence shelter. One provider noted that 40% of its clients have experienced some form of domestic or dating violence. Several providers expressed the need for more transitional and permanent supportive housing models plus services to help homeless clients navigate access to needed resources. All providers have extensive waiting lists for both housing and shelter and are 100% occupied in most cases. Several interviewees mentioned a need for more rental housing for elderly and disabled persons as well as single homeless mothers. Opportunities for sustainable rental development will require significant capital plus rent subsidies, access to transportation, employment and other services, and more engagement with banks, foundations, tribes, and other partners to leverage HOME-ARP funds with other resources.

Service needs in the county are substantial for all Qualifying Populations with transportation and mental health services mentioned the most frequently, along with child-care, employment, job training, food, and services for disabled children. Many interviewees noted that there is only one mental health provider in the area, and a lack of state resources for mental health services. Physical and non-physical disability is the primary complaint received by fair housing organizations. Several agencies mentioned a need for better coordination though a homeless provider coalition or central navigation center.

See more detailed discussion of consultation in Section 2.A.

3. Public Participation

A. Process

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan.

The County began its public participation process with a Community Needs Survey distributed throughout the County and during community engagement public hearings. This survey was

utilized to gather information from respondents on their views on the specific needs and priorities within their communities. After the completion of the Community Needs Survey process, survey data was evaluated, and this information was utilized as a starting point for discussion with various individuals, groups, and organizations during focus group sessions held online. This wide variety of contacts included: local officials, substance abuse and mental health organizations, COCs, housing advocates and developers, homeless services advocates, and other members of the public. The County conducted three meetings between January 18 and 19, 2023. The public sessions included presentations to explain the HOME-ARP Allocation Plan and an opportunity for citizen comments. The meetings were held virtually via Zoom.

Public meeting notices were posted on the County's website and social media and distributed directly to local officials; developers; non-profit organizations; and the Continuum of Care.

Once drafted, the plan was released for a 15-day comment period beginning March 1, 2023. A copy of the draft was posted on the County's website.

Date of Public Notice:

The notice announcing the public comment period and public hearing was published on February 19, 2023. See **Appendix B**.

Public Comment Period:

A 15-day public comment period during which the draft was available on the County's website began on March 1, 2023 and ended on March 16, 2023.

Date of Public Hearing:

A public hearing was held on March 9, 2023 to provide a summary of findings and collect comments from the public.

B. Efforts to Broaden Public Participation

Describe efforts to broaden public participation.

The County utilized a variety of outreach methods to distribute the community needs survey and to announce the community meetings including:

- Posted the information on the Mobile County website.
- Distributed the information to all Mobile County partner agencies including (but not limited to): The Chamber of Commerce, Housing Authorities, and non-profit

organizations. Non-profits, such as 211 United Way, were asked to share the information with their communities.

- Posted the information on Mobile County's social media platforms on weekly basis for three weeks.
- Generated news articles that were shared by Fox 10 News.

C. Comments and Recommendations Received

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing.

The County did not receive any comments on the draft plan.

D. Comments or Recommendations Not Accepted

Summarize any comments or recommendations not accepted and state the reasons why.

Not applicable. The County did not receive any comments on the draft plan.

4. Needs Assessment and Gaps Analysis

A. Size and Demographic Composition of Qualifying Populations

Describe the size and demographic composition of qualifying populations within the PJ's boundaries.

The needs assessment and gap analysis must evaluate the "demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations."² The qualifying populations are as followed:

- Homeless
- At-risk of Homelessness
- Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking
- Veterans and Families that include a Veteran Family Member

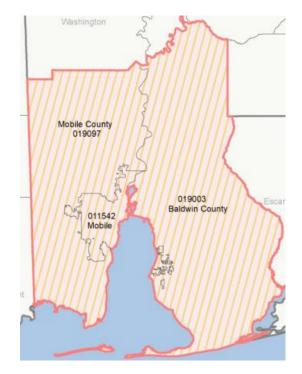
² HOME ARP Guidance.

• Other Populations (Other Families Requiring Services or Housing Assistance to Prevent Homelessness and Households at Greatest Risk of Instability)

There are several demographic overlaps of these discreet qualifying population categories as defined in the HOME ARP Guidance. For this needs assessment section, two primary categories will be used, Homeless and At-Risk of Homeless. Within these large categories, needs and gaps of other qualifying populations will be described.

Homeless Individuals, as defined in 24 CFR 91.5

Regional Data Collection: Mobile County is a part of the Mobile City and County / Baldwin County Continuum of Care (CoC). Point-in-Time data reported in this section will represent data collected for the entire CoC. A boundary map for this CoC can be found below:



Source: 2020 CoC Dashboard Report – AL-501

2021 Data Collection: While a Point-in-Time homeless count for the Mobile City and County / Baldwin County Continuum of Care was submitted to HUD in 2021, conditions created by COVID-19 pandemic in 2021 limited this estimate to a sheltered-only count. As such, totals reported below will cite comparisons between the 2022 Point-in-Time count and prior years (omitting the limited 2021 estimate). *Data for 2022:* According to the HUD Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations data for the Mobile City and County / Baldwin County Continuum of Care from 2022, 585 persons were identified as homeless, with 388 (66%) of those persons sheltered, and 76 (13%) identified as chronically homeless.

As shown in the summaries below for the Mobile City and County / Baldwin County Continuum of Care, households without children represented about 73% of the homeless households, and about 58% of people experiencing homelessness were in households without children. Nearly 6% of homeless individuals were under 18. Roughly 60% of individuals were male, about 40% were female, 1% were transgender or non-confirming/nonbinary.

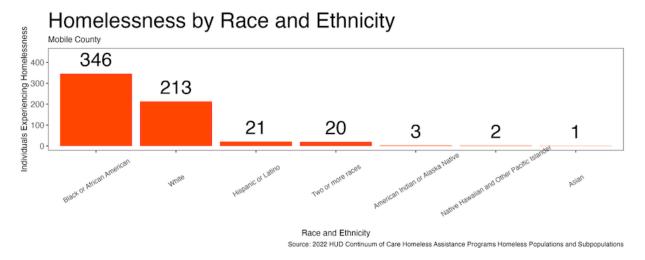
AL-501 Mobile City & County/Baldwin County CoC

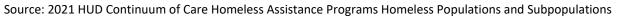
Point-in Time Date: 1/24/2022

mmary by household type reported:	Sheltered			
	Emergency Shelter	Transitional Housing*	Unsheltered	Total
Households without children ¹	117	53	177	347
Households with at least one adult and one child ²	37	25	3	65
Households with only children3	0	0	0	0
Total Homeless Households	154	78	180	412
mmary of persons in each household type:				
Persons in households without children ¹	120	53	188	361
Persons Age 18 to 24	8	0	9	17
Persons Over Age 24	112	53	179	344
Persons in households with at least one adult and one child ²	130	85	9	224
Children Under Age 18	87	56	5	148
Persons Age 18 to 24	8	4	1	13
Persons Over Age 24	35	25	3	63
Persons in households with only children ³	0 0	0	0	0
Total Homeless Persons	250	138	197	585
mographic summary by ethnicity:				
	Emergency Shelter	neltered Transitional Housing*	Unsheltered	Total
Hispanic / Latino	15	i ransitional riousing" 3	3	21
Non-Hispanic / Non- Latino	235	135	194	564
•				
Total	250	138	197	585
mographic summary by gender:				
Female	121	58	51	230
Male	128	80	144	352
Transgender	1	0	1	2
Gender Non-Conforming (i.e. not exclusively male or female)	0	0	1	1
Questioning	0	0	0	0

Source: 2022 HUD Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations

With respect to race and ethnicity, Black/African American individuals represented 59.1% of the homeless population, about 36.4% were white, 0.2% were Asian, 0.5% were American Indian or Alaskan Native, 0.3% were Native Hawaiian or Other Pacific Islander, and 3.4% identify by multiple races. About 3.6% identify as Hispanic or Latino.



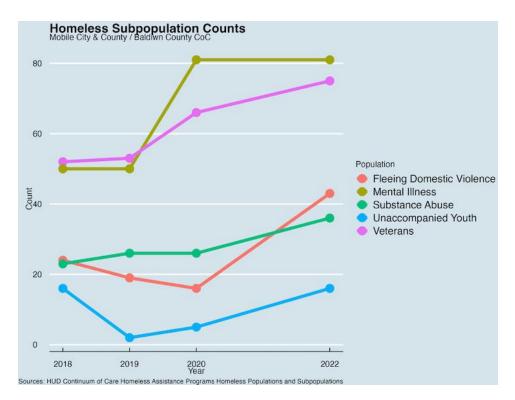


When looking at the different self-identified categories of homeless persons throughout the CoC in 2022, roughly 14% suffered from a mental illness (81 individuals) and 6% (36 individuals) struggled with chronic substance abuse. Veterans made up 13% of the homeless population. Victims of domestic violence made up 7% of the homeless population, and unaccompanied youth represented an additional 3%.

Veterans, Victims of Domestic Violence, and other Categorized Populations

HOME ARP Guidance specifically identifies individuals "Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking" and "Veterans and Families that include a Veteran Family Member" as two qualifying populations eligible to receive assistance.

When looking at the different self-identified categories of homeless persons throughout the Mobile City and County / Baldwin County Continuum of Care in 2022 relative to prior years, the number of individuals with a mental illness has increased notably (from 50 individuals in 2019 to 81 individuals in 2022). The number of domestic violence victims counted in 2022 (43) was more than double the count in 2020. The number of veterans also increased, from 53 individuals in 2019 to 66 individuals in 2020 to 75 individuals in 2022:



With respected to shelter status, those experiencing mental illness, substance abuse, and unaccompanied youth were most likely to be unsheltered. A majority (55%) of those experiencing mental illness were unsheltered (45 individuals). 27 of 36 individuals (75%) with a substance abuse issue were unsheltered, as were 8 out of 16 (50%) of all unaccompanied youth.

Homeless Families and Youth

The 2022 Point-in-Time Count identified 65 families experiencing homelessness. Those 65 families represent 224 individuals, or roughly 3.4 persons per family. As is true with all Point-in-Time estimates, this total likely underestimates the true total of families experiencing homelessness, as volunteers can have a difficult time locating families staying in vehicles or other locations hidden from view.

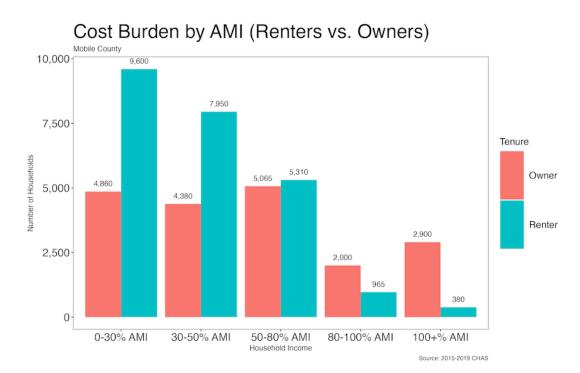
At Risk of Homelessness, as defined in 24 CFR 91.5

As defined in the HOME ARP Guidance, households at risk of homelessness are those with incomes below 30% of AMI that do not have resources or family, friend, or faith-based support networks to prevent homelessness, and:

- 1. Has moved because of economic reasons two or more times during the 60 days,
- 2. Lives in the home of another because of economic hardship,
- 3. Has received a 21-day eviction notice,

- 4. Lives in a hotel or motel, which is not paid for with assistance from a charitable organization or government,
- 5. Lives in overcrowded conditions as defined by HUD, OR
- 6. Is exiting a publicly funded institution or system of care.

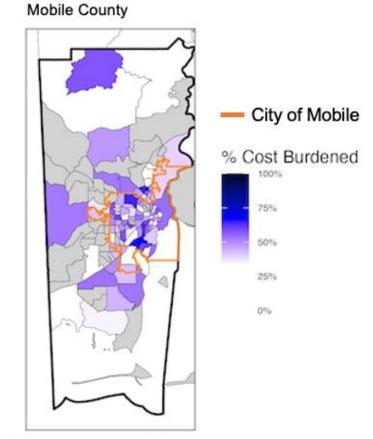
Cost burden, which is the ratio of housing costs to household income, is an indication of housing need, and the need for reduced rental costs. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs," which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. Renter households who pay more than 30% of their income for rent and utilities are considered cost burdened. In Mobile County, households earning between 0-30% AMI are more likely to pay more than 30% of their income towards housing expenses.³ Among all renters in Mobile County who earn less than 30% AMI, 66% are cost burdened (a total of 12,590 households).



Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2015-2019.

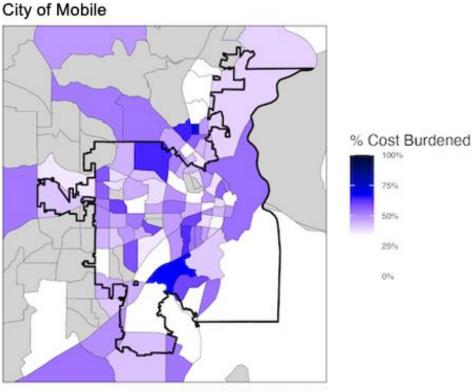
³ Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs," which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.

The map below depicts areas in which the share of cost burdened renter households is highest across the County (per 2015-2020 HUD Comprehensive Housing Affordability Strategy data). Areas of concentration exist within the City of Mobile in several neighborhoods: in the northwest portion of the city, where several affordable housing developments sit both above and below Highway 98; along the 1-10 corridor in the southern part of the city; and in the City of Chickasaw, which sits just north of the City of Mobile.



Renter Households with Cost Burden

Source: 2015-2019 CHAS, Tigerline



Renter Households with Cost Burden

Source: 2015-2019 CHAS, Tigerline

COVID-19 Related Emergency Rental Assistance

Many of the eligibility requirements for the U.S. Department of Treasury's Emergency Rental Assistance Programs overlap with HOME ARP eligibility requirements, including:

- At risk of homelessness or experiencing housing instability (e.g., past due notice, nonpayment of rent, or eviction notice) and
- A household income less than 80% AMI.⁴

Mobile County leveraged federal funding from the U.S. Treasury to develop and administer its own local emergency rental assistance program. This program, which concluded in 2021, distributed \$19,268,041 to 4,066 households (an average of \$4,379 per household). The amount

⁴ While 80% AMI is the upper limit of assistance, many state and local ERA programs have developed systems to prioritize assistance for households earning 30% AMI.

of application demand (10,290 received for the program) indicates sustained need for households that persists beyond the pandemic.

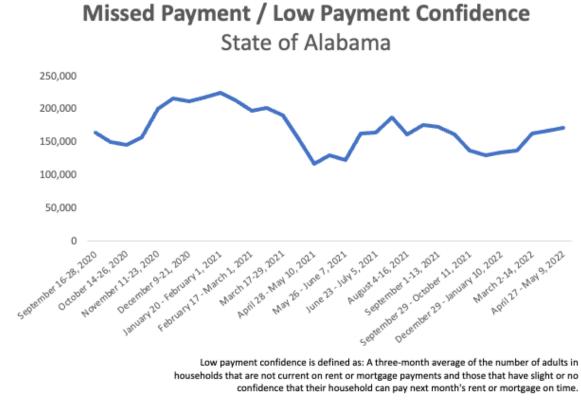
This sustained need for assistance is evident in local 211 call data. According to this source, 3,801 referrals were made within Mobile County related to rental assistance in the 2022 calendar year.⁵

Housing Insecurity and Eviction

Additionally, data collected in the online Household Pulse Survey, which measured housing insecurity throughout the COVID-19 pandemic found that households experiencing housing insecurity⁶ in the State of Alabama remained relatively constant from the beginning of the pandemic through May 2022. The latest available estimates (from March through May of 2022) indicate that more than 150,000 households across the state recently missed a rent/mortgage payment or have slight or no confidence that their household can pay next month's payment on time.

⁵ Data provided by Lifelines Counseling Services, Inc.; total includes referral resource topics that include the following: "ARP Utility Assistance", "ARP Rental Assistance", "Rental Assistance", "HUD Rental Program", "Mobile County Mortgage and Utility Assistance."

⁶Housing Insecurity as defined by the Household Pulse Survey includes households that have missed the last months' rent or mortgage payment, or who have slight or no confidence that their household can pay next month's rent on time.

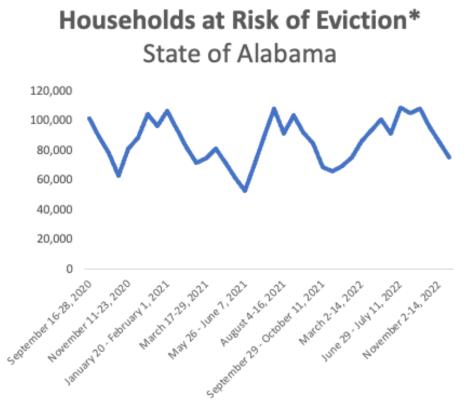


Source: U.S. Census Bureau, Household Pulse Survey

As Mobile County represents roughly 8% of the state's population⁷, this data helps establish a rough baseline data point of approximately 12,000 households across the county experiencing housing insecurity in a given month between 2020 and 2022.

The Household Pulse Survey also measures the percentage of adults in households not current on rent or mortgage were eviction or foreclosure in the next two months is either very likely or somewhat likely. The graph below details the residents in the State of Alabama reporting that eviction or foreclosure was likely between August 2020 and July 2022. The data suggests and upand-down trend throughout the period, with peaks in January 2021, July 2021, and July 2022. The most recent statewide data (from November 2022) estimated that approximately 60,000 households viewed eviction within the next two months as either very likely or somewhat likely. This statewide total, applied to Mobile County's population share, would represent approximately 4,800 households.

⁷ Per 2020 5-Year Census ACS Estimates



Eviction risk is defined as: A three-month average of the number of households not current on rent or mortgage payments where eviction or foreclosure in the next two months is either very likely or somewhat likely.

Source: U.S. Census Bureau, Household Pulse Survey

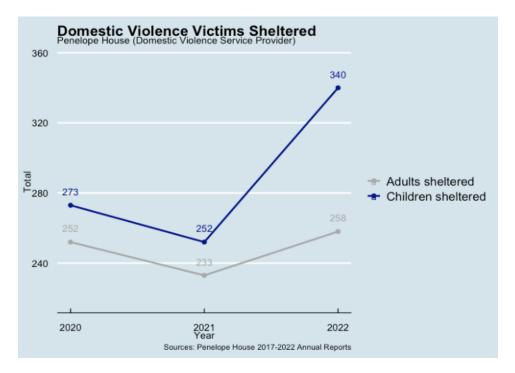
Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the HOME-ARP Notice

HOME ARP Guidance specifically identifies individuals "Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking" as a specific qualifying population eligible to receive assistance.

As was noted previously, the 2022 Point-In-Time Report identified 43 homeless victims of domestic violence. ⁸ This total was the highest reported of any county across the state. Penelope House, a Mobile-based service provider, reported sheltering a total of 258 adults and

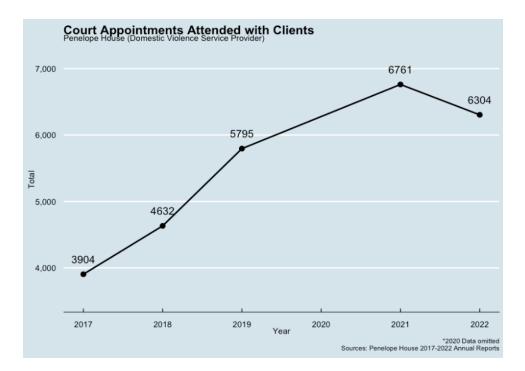
⁸ Crime.Alabama.gov, Alabama Domestic Violence Crimes (https://crime.alabama.gov/Data/DomesticViolenceCrimes)

340 children in 2022⁹ The number of children sheltered represented a 35% year-over-year increase from 2021:



Penelope House handled 1,746 crisis calls in 2022 and provided court advocacy to 6,304 adult clients. Assistance in court has become an increasing need for clients in domestic violence cases, as the number of annual appointments increased by 61% from 2017 to 2022.

⁹ Penelope House, 2020 Annual Report (<u>https://img1.wsimg.com/blobby/go/cd589a0e-fb3c-4004-917c-59881e694cd8/downloads/Penelope%20House%202020%20Annual%20Report.pdf?ver=1670263903915</u>)



Lifelines Counseling Services, Inc, the County's 211 service provider, operates a 24-hour line via its Rape Crisis Center. In 2022, this service provider took 573 crisis calls, 156 of which included referrals to local hospitals for sexual assault victims.

Domestic violence service providers consulted for this Plan indicated a need for more shelter options for those fleeing domestic violence and one general shelter provider noted that 40% of its clients have experienced some form of domestic or dating violence.

With respect to sex trafficking, youth represent most trafficking victims. Nationally, each year 23,000 young adults age out of the foster care system. It is estimated that 70% of young people who become victims of human trafficking were in the child welfare system. Locally, the Rose Center opened its drop-in center for trafficking victims in 2018 and has helped more than 330 women and children ranging in ages from 8 to 45. The Center reports, however, that the average age of forced entry into trafficking is 13.

Other Populations Requiring Services or Housing Assistance to Prevent Homelessness and Other Populations at Greatest Risk of Housing Instability, as defined by HUD in the HOME-ARP Notice

The HOME-ARP notice defines families *"Requiring Services or Housing Assistance to Prevent Homelessness"* as households (i.e., individuals and families) who have previously been qualified as "homeless" as defined in 24 CFR 91.5, are currently housed due to temporary or emergency

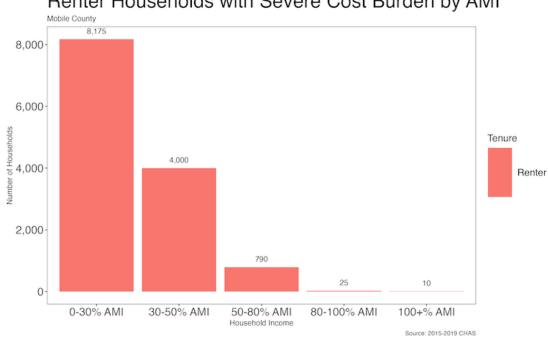
assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness. From 2019 to 2020, the total number of chronically homeless has increased by 65% (from 43 individuals to 71 individuals). Chronically homeless households, as defined by HUD, are persons with a long-term disabling condition who have been continually homeless for a year or more, or at least four times in the past three years where the length of time in those episodes add up to a year or more. These households are likely to need greater supportive services and case management to stay housed once housing is secured for them. Of those counted in 2020, 92% were unsheltered.

The HOME-ARP notice defines "Other Populations at Greatest Risk of Housing Instability" in two ways. The first definition includes those with annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly income on housing costs.) In Mobile County, there are 11, 365 extremely low income and severely cost burdened households, which places them at imminent risk of becoming homeless.

The second definition is that the household has an annual income that is less than or equal to 50% of the area median income, as determined by HUD, and meets one of the conditions of "At risk of homelessness."

In Mobile County, there are 17,980 households earning between 0-50% AMI that are severely cost burdened or paying more than 50% of their income towards housing expenses.¹⁰ Of these severely cost-burdened households, 14,790 or about 68%, are renters and the majority are earning below 30% AMI.

¹⁰ Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs," which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.

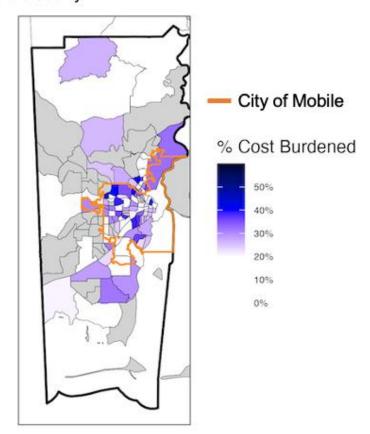


Renter Households with Severe Cost Burden by AMI

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2015-2019.

The map below shows the geographic distribution of the estimated percent of all renters who are severely cost burdened.¹¹ Seven census tracts report more than 40% of renters with a severe cost burden. Areas with severe cost burden for renters overlap with those for which are highlighted previously: in the northwest portion of the city, where several affordable housing developments sit both above and below Highway 98; along the 1-10 corridor in the southern part of the city; and in the City of Chickasaw, which sits just north of the City of Mobile.

¹¹ Severe Cost Burden: renter households for whom gross rent is 50% or more of household income.



Renter Households with Severe Cost Burden Mobile County

Source: 2015-2019 CHAS, Tigerline

City of Mobile

Renter Households with Severe Cost Burden

Source: 2015-2019 CHAS, Tigerline

HOME ARP Guidance specifically identifies "Veterans and Families that include a Veteran Family Member" as another eligible population under HOME-ARP. Geographically, the Gulf Coast is home to the second-highest density of veterans in the nation. Veteran Recovery Resources reports there are 65,000 veterans in the Mobile and Baldwin County service area. Veteran homelessness is discussed in the Homelessness section of this Plan.

Research shows that people with disabilities are likely to fall into this qualifying population. Stakeholders reported that people with disabilities include those experiencing mental health challenges and that the regional sees high instances of mental health struggles. Many interviewees noted that there is only one mental health provider in the area, and a lack of state resources for mental health services. Further, physical and non-physical disability is the primary complaint received by fair housing organizations. See Section 4.C. for more information on Mental Health Service needs.

B. Current Resources Available to Assist Qualifying Populations

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional).

Congregate and Non-Congregate Shelter Units

As indicated in the 2021 HIC (Housing Inventory Count), the Mobile City and County/Baldwin County Continuum of Care had 741 total year-round shelter beds for people experiencing homelessness: 97 are described as family units, 306 are described as "family beds", 435 are described as adult only beds, and none are described as child only beds. Of these total year-round shelter beds, 94 are reserved for chronically homeless and 132 are reserved for veterans.

Supportive Services

Lifelines Counseling Services, Inc, the County's 211 service provider, collected data in 2022 on the volume, referral topic, and client demographics. The County made a total of 27,630 referrals in 2022. 63% of those referred who provided information on their race or ethnicity identified as Black or African American. 33% identified as white, and fewer than 1% identified as Asian, Hispanic or Latino, or by a different race. 2,548 of those referred receive SNAP assistance.

While not all referrals are tied to a specific category of assistance, data from 2022 includes referrals for the following types of services:

- 1,662 to food pantries or food assistance services
- 1,550 to affordable housing search and placement resources
- 902 to resources for home repair assistance
- 808 to senior services providers
- 759 to resources for women and victims of domestic violence
- 185 to resources for veterans

Services for those Fleeing, at Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

Services for those fleeing or attempting to flee domestic violence are provided through Penelope House. Penelope House helps victims of intimate partner violence to gain social and economic independence through shelter, counseling, advocacy, and referral to community resources and agencies in Mobile, Washington, Choctaw, and Clarke Counties in Alabama. The shelter can provide refuge for victims and their children when their lives are in imminent danger. Temporary shelter allows escape from a violent situation. The prevention of domestic violence through education and public awareness is the goal of Penelope House.

Additionally, the Child Advocacy Center provides counseling, education, and training for abused children and their non-offending family members. The goal of the Child Advocacy Center is to provide a wide range of services in one central location to sexually abused and/or severely physically abused children so that they may begin their healing process. The Center also provides education and training to increase the public awareness of child abuse to aid in prevention.

With respect to services for those fleeing sexual assault, over the last year the Rape Crisis Center took in 573 crisis calls and 156 calls to report specifically to the hospital for individuals who had been sexually assaulted and needed to have Sexual Assault examination.

For those fleeing trafficking, The Rose Center is a daytime, drop-in facility for victims and survivors. Advocates assist victims with transportation and provide information about victims' rights and resources.

Services for Veterans

Veterans Recovery Resources noted that their programs meet veterans where they are to build trust and a supportive client relationship. This model employs peer support, which has been a successful model. VRR is and that model is something that should be considered for all vulnerable

populations. VRR is also in the process of building a substance detox and residential treatment facility to be opened later in 2023.

Services for Opioid Overdose and Addiction

Mobile County faces some of the highest rates of opioid addiction in the nation. From January 2022 to June 2022, county EMS units reported 725 overdose-related calls (or 1.75 calls per 1,000 residents). Only one Alabama county (Huntsville) reported a higher total in this period. The county is on track to match or exceed its call volume in 2021 (1,529 calls).

The State of Alabama's Opioid Overdose and Addiction Council has worked to deploy federal funding to provide localized support. The Council expanded treatment capacity with Faith-Based Support Specialist Program and supported the distribution of more than 29,000 naloxone doses. In July 2022, the State launched the Connect Alabama mobile phone application, which provides resources and education about substance abuse.

As of October 2022, Mobile County reported 1,575 residents enrolled in treatment for substance use disorders in the calendar year. This total is on pace to meet or exceed the county's 2021 total of 1,946 residents in treatment and it represents a near-100% increase over the same total in 2016.

Tenant Based Rental Assistance

The Housing Choice Voucher Program, also known as the Section 8 Program, provides tenantbased and project-based assistance, in the form of a voucher, to low-income families, seniors and persons with disabilities for rental units chosen by the tenant in the private market. The Pritchard Housing Authority and Mobile County Housing Authority operate tenant-based Section 8 Programs.

The Chickasaw Housing Authority and the MOWA Choctaw Housing Authority do not operate housing voucher programs.

Affordable and Permanent Supportive Rental Housing

Public housing in Mobile County is operated by the Housing Authority of the City of Prichard (HACP), the Chickasaw Housing Authority, and the Mobile County Housing Authority.

- The Pritchard Housing Authority operates four properties:
 - Ridge Manor I and II Apartments
 These HUD Multi-Family units are specifically for elderly and/or disabled families.

There are 120 one and two-bedroom units available, with onsite supportive services and scheduled activities. The waiting list is currently open.

• Chancery Square Apartments

This 56-unit tax-credit property includes one, two and three-bedroom apartments, playground and gazebo, these units provide affordable and familyfriendly place to live. The waiting list is currently open.

• Leeds Street Homes

Comprised of 50 low-rent single family homes, this community has three and four-bedroom units. The waiting list is currently open.

• NSP2 Rentals

The NSP2 program provides rental opportunities throughout the city and is designed to assist families that have annual income up to 120% of the area median income. The waiting list is currently open.

- The Chickasaw Housing Authority has 288 units of affordable housing and operates a wait list organized by family or senior housing and bedroom size. The length of time it takes to reach the top of a waiting list will depend on the size of the family, the family's circumstances, and the availability of housing that meets the family's needs.
- The Mobile County Housing Authority program consists of 50 units of public housing. Unit sizes range from 3 5 bedrooms.

The MOWA Choctaw Housing Authority is a tribally-designated housing entity established to access, construct, and manage housing for tribal members. MOWA has 68 rental units and 48 homeowner units funded through HUD's Office of Native American programs (ONAP). They are 100% occupied with 300 people on the waiting list.

Other sources of affordable housing include the low-income housing tax credit program and HOME. Currently, the County has 47 HOME-assisted rental units with an additional 6 units planned for development.

With respect to permanent supportive housing, according to the 2021 HIC, there are 254 permanent supportive housing beds and 100 rapid rehousing beds throughout the CoC.

C. Unmet Housing and Service Needs of Qualifying Populations

Describe the unmet housing and service needs of qualifying populations.

Homeless Populations, as defined in 24 CFR 91.5.

According to the Mobile City and County / Baldwin County Point-in-Time Count from 2022, 585 persons were identified as homeless, with 388 (66%) of those persons sheltered. As indicated in the 2021 HIC (Housing Inventory Count), the Continuum of Care had 741 total year-round shelter beds for people experiencing homelessness. While this would appear to be sufficient beds to house those experiencing homelessness, some shelter beds are reserved for specific populations such as families, veterans, and those fleeing domestic violence. Further, shelters tend to be concentrated in specific areas so that needs are not met for all people experiencing homelessness.

A comparison of emergency shelter and transitional housing beds and family units totaled in the 2021 Housing Inventory Count to the 2022 Point-In-Time Count reveals a shortfall in adult-only and veteran beds:

Homeless Needs Inventory and Gap Analysis						
Nightly Shelter Inventory	Family Beds	Family Units	Adult Only Beds	Veteran Beds		
Emergency Shelter	180	59	134	-		
Transitional Housing	96	29	57	58		
Nightly Homeless Population	Individuals in Families	Family Households	Adults	Veterans		
Sheltered	215	62	173	59		
Unsheltered	9	3	188	16		
Shelter Gap*	Family Beds**	Family Units	Adult Only Beds	Veteran Beds		
Emergency Shelter &						
Transitional Housing Need	52	23	(170)	(17		

* Shelter Gap calculations are sensitive to the categorization of shelter inventory by population served (i.e. the narrow surplus in family beds shown above would show as a deficit if 52+ family beds were recategorized as adult only beds).

**Family Bed gap calculation assumes a 1-1 relationship between Family Beds and Individuals in Families.

Shelter waitlists provide additional perspective on the need for shelter for specific populations. Volunteers of America Southeast, Inc. operates several shelters across the county and reported waiting list sizes listed below for population-specific shelter (as of February 2022):

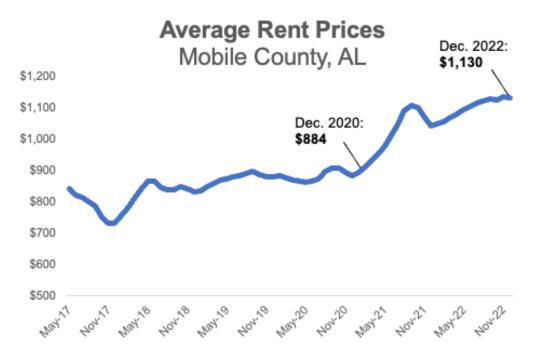
- 73 seniors
- 31 individuals with a disability
- 5 families

These totals, in conjunction with the shortfall in adult-only and veteran beds shown in the table above, convey a need for additional shelter that matches the needs of each of these specific populations.

At Risk of Homelessness, as defined in 24 CFR 91.5.

Cost burden and extreme cost burden are the most common housing problems for Mobile County households earning less than 30% of AMI. Among all renters in Mobile County who are cost burdened, over 72% earn below 50% of AMI: 9,600 households under 30% AMI and 7,950 households between 30 and 50% AMI.

As incomes for many renters stay stagnant, costs of rents have been increasing. According to Apartment List, an online data source for rent and vacancy information nationally, the current median cost of a 1-bedroom unit in Mobile County is \$857, a \$187 increase since December 2020, and the current median cost of a 2-bedroom unit is \$1,096, a \$239 increase since December 2020. As was discussed earlier, the County's 211 provider received 1,550 calls from residents searching for affordable housing in 2022. See the graphic illustration below for a view of average rents for all unit sizes. As rents increase, renters will spend increasingly higher percentages of their income on housing costs, which will further deepen concerns of housing instability.



Source: Apartment List Rent Estimate Data, December 2022

Rising rents are, in part, the result of decreases in available vacant units. From 2020-2022, Mobile County saw a period of historically low vacancy rates, with rates dipping to 3.5% across the state in May 2021. Limited housing availability has contributed to the increasing rent costs over this same time period. Influx of industry to the area is likely to affect vacancy rates in the short term.



Source: Apartment List Vacancy Estimate Data, December 2022

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

As was mentioned previously, 4,435 domestic violence crimes occurred in 2021 in Mobile County.¹² A local service provider (Penelope House) provided shelter to 252 adults and 273 children in 2020.¹³ Penelope House also handled 1,419 crisis calls and provided court advocacy to 5,997 adult clients. 211 referral data reflected an additional 759 calls from women and victims of domestic violence in 2022.

The 2022 Point-In-Time Report identified 43 homeless victims of domestic violence. Domestic violence or human trafficking survivors often lack easy access to short-term shelter and quick access to medical and mental health and other services.

Those fleeing domestic violence who use intervention services (e.g., counseling, information services, human resources, or employment assistance programs), and other workplace support services have a much better positive outcome, including a more positive outlook, greater drive to achieve their goals, better mental health, stronger workplace performance, and lower rates of absenteeism.

Further, experts generally concur that the programs and needs of children experiencing domestic violence have increased with the rising incidents of violence in families making their needs a heightened priority. Children need an environment with programs to address the trauma they have experienced.

Other Populations Requiring Services or Housing Assistance to Prevent Homelessness and Other Populations at Greatest Risk of Housing Instability, as defined by HUD in the HOME-ARP Notice

Severely cost burdened households are those with housing expenses greater than 50% of their income and earning less than 50% of AMI. In Mobile County, there are 17,550 renter households

¹² Crime.Alabama.gov, Alabama Domestic Violence Crimes (<u>https://crime.alabama.gov/Data/DomesticViolenceCrimes</u>)

¹³ Penelope House, 2020 Annual Report (<u>https://img1.wsimg.com/blobby/go/cd589a0e-fb3c-4004-917c-59881e694cd8/downloads/Penelope%20House%202020%20Annual%20Report.pdf?ver=1670263903915</u>)

earning between 0-50% of AMI that are severely cost burdened or paying more than 50% of their income towards housing expenses.¹⁴

The issues already discussed in the previous sections for those at risk of homelessness, including cost burden, apply equally to those facing housing instability.

Mental Health Services

According to Mental Health America's "State of Mental Health in America" report, Alabama ranked 50th of 51 states (including the District of Columbia) in an Access to Mental Health Care Ranking.¹⁵ The ranking measures 9 access points for residents that include items like: access to insurance, access to treatment, quality and cost of insurance, access to special education, and workforce availability.

Veteran Housing and Supportive Services Needs

The Veterans Recovery Resources (VRR) along with the USA Polling Group published the 2022 Veteran's and First Responder's Community Health Needs Assessment. The findings from the assessment indicate a growing disparity in access to services for veterans in Mobile and Baldwin Counties, as well as the need to expand behavioral and mental health services. Geographically, the Gulf Coast is home to the second-highest density of veterans in the nation. VRR reports there are 65,000 veterans in the two-county service area, and only 26% are enrolled in VA services. VRR also noted a need for the expansion of PTSD treatment, health insurance, and group therapy options for veterans.

D. Gaps within Current Shelter and Housing Inventory and Service Delivery Systems

Identify any gaps within the current shelter and housing inventory as well as the service delivery system.

As described throughout this Plan, the consultation with residents and stakeholders reveals a gap in affordable units due to rising rents and decreasing vacancy. As discussed previously, in Mobile County rents have increased by 28% from December 2020 to December 2022 and vacancy rates have fallen as low as 3.5% during this period. As individuals become housing insecure or

¹⁴ Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs," which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.

¹⁵ Mental Health America (<u>https://mhanational.org/issues/2022/ranking-states</u>)

homeless, it becomes more difficult for them to find housing in a market where prices are increasing, and housing stock is limited. Per the National Low-Income Housing Coalition, the State of Alabama faces a shortage of over 76,000 affordable housing units.

MOWA Choctaw Housing Authority indicated a waiting list of 300 people. The Mobile County Housing Authority's Section 8 waitlist is currently not accepting application.

Service providers have seen a significant strain on both temporary and permanent shelter for those who request it daily. According to the 2021 HIC, there are 254 permanent supportive housing beds and 100 rapid rehousing beds throughout the CoC but these resources are not enough to meet the need. Further, supportive services needs in the community continue to grow as strains on mental health, the impact of the opioid epidemic, the effects of the pandemic, and rising housing instability increase demand for resources that address basic human needs and overall wellness.

E. Additional Characteristics Associated with Instability and Increased Risk of Homelessness

Optional: Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of "other populations" that are "At Greatest Risk of Housing Instability," as established in the HOME-ARP Notice. If including these characteristics, identify them here.

The County does not plan to formally adopt additional definitions of "other populations," however, a look at additional characteristics that can help clarify the stressors on those facing housing instability in the County is useful. The high-cost burden is a housing characteristic strongly linked with instability and an increased risk of homelessness. In ability to earn a living wage directly affects the cost burden that households face. The National Low Income Housing Coalition estimates that the hourly wage needed to afford a two-bedroom apartment in the State of Alabama is \$16.32. To afford a one-bedroom apartment while earning minimum wage, an individual would need to work 74 hours per week.

F. Identify Priority Needs for Qualifying Populations

The following priority needs have been identified for qualifying populations:

• Affordable housing units to address the severe lack of resources available to lowincome households and vulnerable populations

- Supportive services for vulnerable populations that provide wrap around support, particularly to prevent housing instability and to meet basic human needs in a sustainable approach
- Diversion programs, case management, and housing navigation to prevent homelessness
- Shelter space that can accommodate single men experiencing homelessness

G. Determination of Level of Need and Gaps in Shelter and Housing Inventory and Service Delivery Systems

Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan.

The level of need and gaps in shelter and housing inventory and service delivery was determined through an analysis of data and series of community outreach efforts, including an online survey and stakeholder interviews. The data presented in this Allocation Plan is a compilation of data collected from Census, ACS, CHAS, PIT count, data from organizations on the populations served through their programs, and the current Consolidated Plan. Stakeholders consulted to assess need and gaps included the public, the COC, homeless service providers, veterans' groups, domestic violence agencies, the public housing agency and other public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

5. HOME-ARP Activities

A. Method(s) of Selection

Describe the method(s)that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors.

HOME-ARP is a new one-time funding program authorized by the American Recovery Plan Act of 2021. HOME-ARP program requirements do not mirror the requirements of the HOME Investment Partnership Program (HOME program) and potential applicants should not rely on knowledge of the HOME program when contemplating or applying for HOME-ARP funding. Applicants are advised to review HOME-ARP Notice <u>CPD 21-10</u> on the HUD Exchange for more information.

For the development of affordable housing rental housing, the County will use HOME-ARP funds to provide gap financing to projects located in Mobile County and within the Mobile County Consortium jurisdiction. In exchange for low-cost permanent financing, property owners will agree to rent restrictions and to rent to low-income tenants for at least 20 years for new construction projects. Projects are monitored for compliance during this 20-year affordability period. Project sponsors must coordinate funders' requirements when there are multiple funding sources. The RFP for affordable rental housing units will outline specific application deadlines and any other special considerations applied to a given funding round. Upon submission of a proposal for HOME-ARP funds for affordable rental housing development, County staff will conduct a review and analysis of the project and developers as presented in the proposal. Proposals will be scored based on criteria in the RFP. Projects seeking County HOME funds prior to the receipt of all other funding sources, including state or federal tax credit reservations, may be provided with non-binding preliminary awards. Only projects with firm commitments for all other permanent and construction funding may receive binding commitments. Further, eligible HOME-ARP rental housing projects will be provided funding awards upon Commission approval and may be contingent upon the 1) County's approval of the Mobile County Consortium Action Plan by the Mobile County Commission and HUD; 2) the County's receipt of HOME funds from HUD; 3) the applicant's award from the Alabama Housing Finance Authority (AHFA) for LIHTC, if applicable; and 4) the County's receipt of the HUD Authority to Use Grant Funds following completion of the Environmental Review process. The County reserves the right to require the submission of additional information as needed to complete project underwriting. Rental housing applicants whose projects rely on the award of LIHTC must also submit a copy of their completed AHFA application, including all attachments, prior to the formal commitment of HOME funds.

For supportive services activities, the County will public hearings and accept funding proposals each program year from public and private agencies / non-governmental organizations (NGOs) within a deadline to be established. All proposals are reviewed by a Project Review Committee and a recommended budget is presented to the Mobile County Commission for review and final action. The Committee considers proposals based upon eligibility criteria set forth in the federal regulations promulgated by HUD, the extent to which proposals address the priorities and support the goals established in the Consolidated Plan, and how the proposals fit into the availability of formula grant funds.

B. Direct Administration by PJ

Describe whether the PJ will administer eligible activities directly.

The County will contract with subgrantees for the implementation of activities and monitor all activity delivery.

C. No Use of Subrecipient

If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program

The County has not provided funds to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP Allocation Plan and will not allocate funds to a subrecipient nor contractor to administer the entire HOME-ARP grant.

D. Use of HOME-ARP Funding

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

	Funding Amount	Percent of the Grant
Supportive Services	\$800,000	36.5%
Acquisition and Development of Non-		
Congregate Shelters	\$0	0
Tenant Based Rental Assistance (TBRA)	\$0	0
Development of Affordable Rental Housing	\$1,061,758	48.5%
Non-Profit Operating	\$0	0
Non-Profit Capacity Building	\$0	0
Administration and Planning	\$328,545	15%
Total HOME ARP Allocation	\$2,190,303	100%

Distribution of HOME-ARP funds In Accordance with Priority Needs

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis.

The County proposes to focus its HOME-ARP funding on development of affordable rental housing and supportive services. This distribution is intended to provide support for the number one priority identified by stakeholders - the severe lack of affordable housing options in the County while offering additional resources for the supportive services identified by the consultation effort, including, but not limited to, mental health, physical health, transportation, and childcare. The County will provide \$1,061,758 for affordable housing development and \$800,000 for supportive services.

Rationale Funding Based on Characteristic Needs Identified in the Gap Analysis

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities.

Stakeholders and the needs assessment overwhelmingly identified more affordable housing units as the most significant gap and need with respect to HOME-ARP eligible uses. Data shows this need has been intensifying over recent years as cost burden among renters becomes more severe in a market with continually increasing rent prices. During this same period, vacancy rates have dropped so that less units are available overall and very few are affordable. Further, units with more affordable costs are often located further from amenities and employment, shifting the rent cost burden to higher burdens around transportation, commute times, and access to opportunities. More affordable units are needed in locations where residents can find employment and access food, health care, and schools. The County intends to use HOME-ARP funds to assist in the development of affordable rental units where these funds can be leveraged with other resources to enhance the impact of the HOME-ARP allocation.

Stakeholders also noted that, for the most vulnerable populations, maintaining housing stability is difficult without supportive services. Providing services that can support households in meeting basic needs and accessing mental and physical care fosters long term stability and success, especially for those transitioning out of difficult situations or facing potential homelessness. Many stakeholders noted the importance of assisting people with services that keep them housed in the current rental market. Those who find themselves unhoused may find it impossible to secure new housing due to rising rents and increased barriers to entry through requirements like high security deposits, eviction background checks, and rent to income ratios.

For both households that have become homeless and those who serve them, the costs of maintaining housing are less than the costs of securing new housing. Services that address housing stability will ultimately reduce the number of those at risk of homelessness and those experiencing homelessness.

6. HOME-ARP Production Housing Goals

A. Estimated Number of Affordable Rental Housing Units for Qualifying Populations

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation.

To address the most urgent need for more affordable housing units, the County has allocated \$1,061,758 in HOME-ARP funding for the development and creation of affordable housing. The County estimates it can subsidize the development of 5-6 affordable units for Qualifying Populations with this allocation through projects that include additional affordable housing resources.

B. Rental Housing Production Goals and Correspondence with Need

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs.

Both the needs and gaps analysis and the community feedback captured throughout the HOME-ARP planning process have highlighted gaps in housing across the County. HOME-ARP resources alone are not sufficient to fill these gaps but offer a powerful tool to leverage other local funding to add additional long-term affordable housing assets.

7. Preferences

A. Identification of Preference

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

The County has not adopted any preferences among the qualified populations in soliciting proposals for supportive services. For any selected project, the County will ensure that the program complies with civil rights and non-discrimination laws.

B. Using Preference to Address Unmet Need

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis.

No preferences were identified.

8. Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional)

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional).

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional).

Optional section.

9. Limitations in a HOME-ARP Rental Housing or NCS Project

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities). Not applicable. No limitations are being implemented.

10. HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with 24 CFR 92.206(b).

Not applicable to proposed use of HOME-ARP funds.

APPENDIX A – SUMMARY OF SURVEY RESULTS

Mobile County HOME-ARP Community Needs Survey

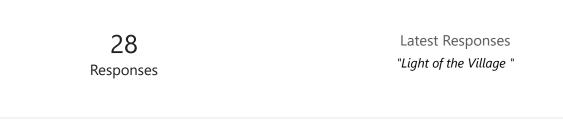
191 Responses	26:57 Average time to complete	Active _{Status}
1. I am completing this survey	for:	
myself.my organization.	155 36	
2. What zipcode do you live in	?	
155 Responses	"2	Responses 36611" 36695"
3. How long have you lived in	the County?	
 I am not a County resident 5 years or less 6 to 10 11 to 20 	8 14 19 12	

More than 21

102



4. What is the name of your organization? (Optional)

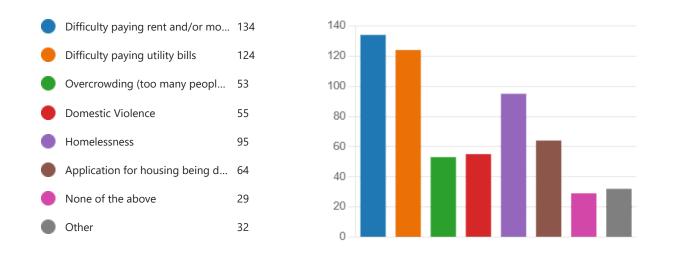


5. What is the primary population your organization servces?

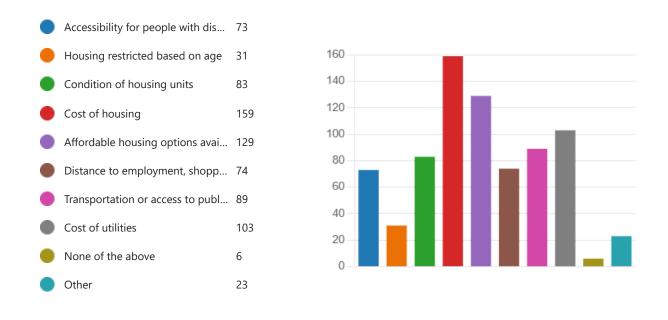
36	
Responses	

Latest Responses "Youth"

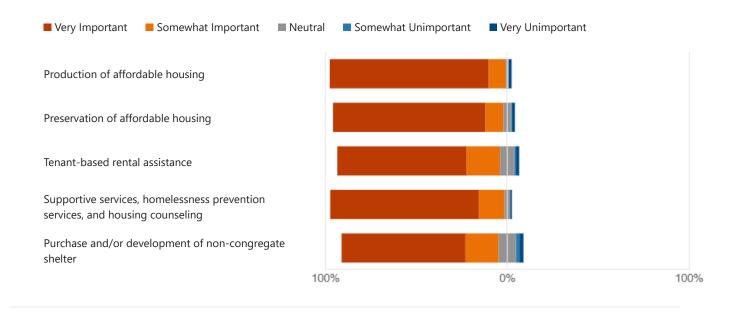
6. Have you or those you serve experienced any of the following in the past 2 years? (Select all that apply.)



7. What are the barriers to finding good housing that you have experienced or observed?



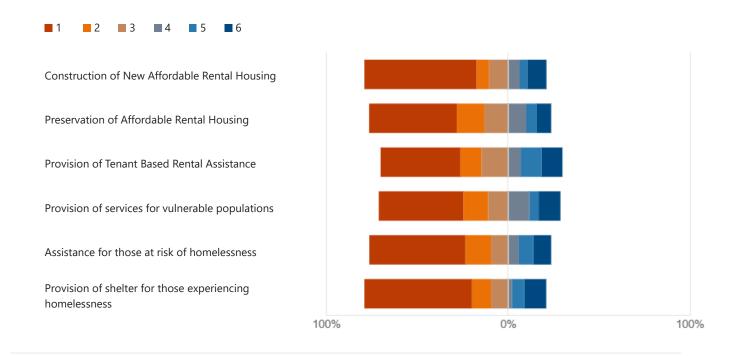
8. HOME-ARP funds can be used for the specific housing needs listed below. Please rank the following HOME-ARP categories based on the needs of people experiencing homelessness, those at risk of homelessness, and other vulnerable populations in your community.



9. Please identify your priorities related to services for those experiencing homelessness, those at risk of homelessness, and other vulnerable populations at risk of housing instability.

Very Important Somewhat Important Ne	utral 📕 Somewhat Unimportant	Very Unimportant	
Assistance with moving costs			
Case management services			
Childcare			
Education services such as instruction or training in consumer education, health education, substance			
Employment assistance and job training			
Supplemental food assistance			
Housing search and counseling services such as tenant counseling; assisting individuals and famili			
Legal services for advice and representation in matter that interfere with ability to obtain and retain housing			
Life skills training such as budgeting of resources and money management, household management,			
Mental health services such as crisis interventions; counseling; individual, family, or group therapy			
Outpatient health services such as services to assist individuals in understanding their health needs;			
Outreach services including crisis counseling; addressing urgent physical needs, such as providing			
Substance abuse treatment services such as participant intake and assessment, outpatient			
Provision of transportation to and from medical care, employment, child care, or other services; assistance			
Assistance with utility deposits			
	100%	0%	100%

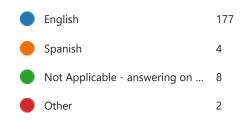
10. Rank the following activities starting with 1 being most underfunded and with the greatest need, and 6 being the least underfunded with the least need.



11. Are there other categories you feel are underfunded and with a great need that can be addressed by HOME-ARP?

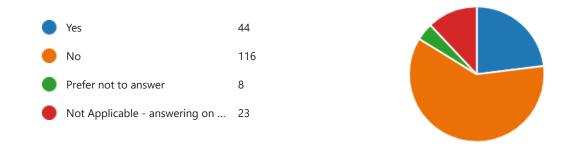
100 Responses Latest Responses "FINANCIAL EDUCATION" "Housing for the elderly "

12. What is the primary language you speak?



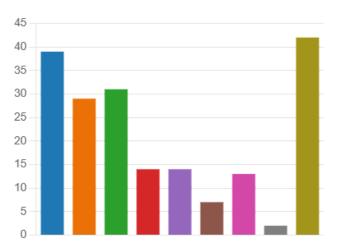


13. Do you have a disability or disabling condition?

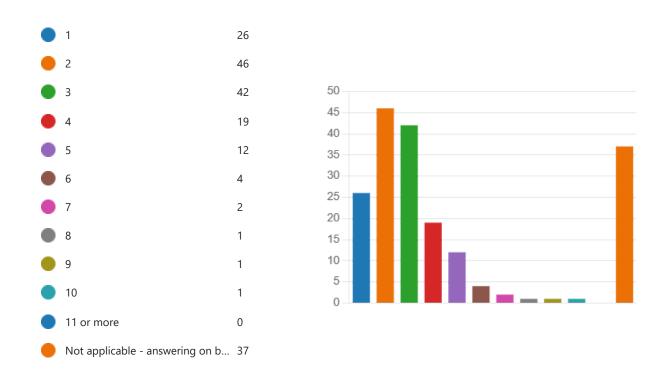


14. What is the total annual income of your household (before taxes)?

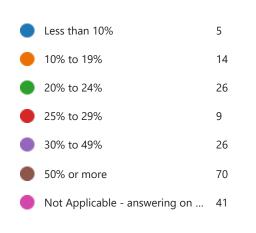


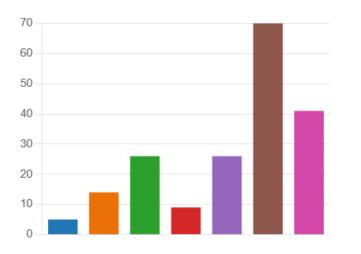


15. How many people are in your household?

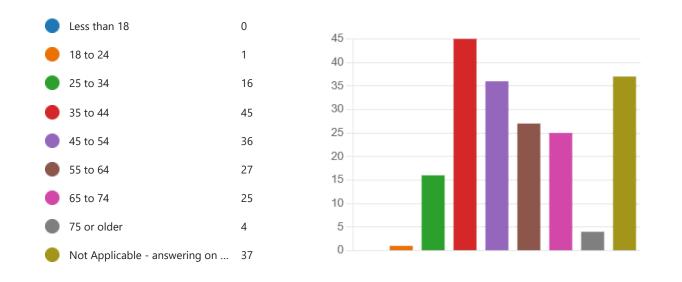


16. About how much of your total household income is spent on housing (includes mortgage, rent, insurance, and utilities)?

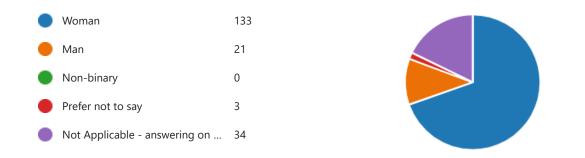




17. What is your age?



18. What is your gender



19. Please share any additional comments regarding housing and community development.

88 Responses Latest Responses "SOCIAL CONSCIOUSNESS ADVOCACY" "Housing in Prichard is very difficult to find."

APPENDIX B – PUBLIC NOTICES

APPENDIX C – Certifications and SF-424s