



Fifth Program Year Action Plan (PY2012-2013)

GENERAL

Executive Summary

The City of Mobile expects to receive a total of approximately \$3.16 million in Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) entitlement funding from the U.S. Department of Housing and Urban Development (HUD) for its 2012 program year. The City's 2012 program year will run from May 1, 2012 to April 30, 2013. This is the Fifth Program Year Action Plan of the City's five-year planning document, the "2008-2013 Consolidated Plan and Strategy." This Action Plan references the 2008 Consolidated Plan which established long term goals and strategies.

The Fifth Program Year Action Plan outlines how the City's estimated 2012 CDBG, HOME, and ESG funds, along with program income and amended budget funds from prior years will be used to improve the quality of life primarily for low and moderate income Mobile residents. Funding will be used to carry out activities that address the priority needs of the target population and neighborhoods. These funds will leverage additional public and private resources to support a range of affordable housing, public facilities and improvements, neighborhood revitalization, planning activities, capacity building for Community Based Development Organizations (CBDOs), public services, and economic development activities which are outlined in this plan. Because proposed funding allocations have been made based on estimated entitlement grant awards, if the City's actual awards are larger or smaller than anticipated when received from HUD, the Community Planning and Development (CPD) Department will consider program budget adjustments on a case-by-case basis.

TABLE 1 : 2012 Action Plan Resources

	Entitlement Grant Expected to Receive	Project Income Estimate	Amended Prior Year Funds	Program Subtotal
CDBG	\$ 2,150,347	\$ 161,835	\$ 0	\$ 2,312,182
HOME	\$ 787,333	\$ 322,782	\$ 2,893,978	\$ 4,004,093
ESG	\$ 225,814	\$ 0	\$ 0	\$ 225,814
GRAND TOTAL	\$ 3,163,494	\$ 484,617	\$ 0	\$ 6,542,089

Summary of Accomplishments

On January 1, 2011, the City of Mobile assumed administration of its entitlement grant programs, previously administered by the Mobile Housing Board. During the first two quarters of 2011, a transition team of City employees worked to identify and reprogram unspent CDBG funds as part of a work plan which also included the recertification of its HOME Program (and anticipated release of HOME funds). The following list of accomplishments includes both projects and programs which were completed during the third and fourth quarters of 2011, and those that will continue through April 30, 2012 (the end of the 2011-2012 program year):

CDBG

- Renovations and improvements on a portion of a former school building now being used as a Senior Activities for Independent Living (SAIL) Center (low mod area)
- Improvements to Baumhauer-Randle Park which included new playground equipment, resurfacing of the existing parking lot, and renovations to the existing concessions and press box building, including code and health department requirements (low mod area)
- Improvements to Herndon Park which included the provision of an ADA compliant walking trail, rest stops, a water fountain, and landscaping to provide recreational opportunities to the community (low mod area)
- Installation of new playground equipment at Bailey Park (low mod area)
- Installation of new playground equipment at Hillsdale Park (low mod area)
- Installation of new playground equipment at Kidd Park (low mod area)
- Pool upgrades and modifications at ten public pools throughout the City to make them compliant with ADA requirements (all in low mod areas)
- Improvements to the Taylor Park swimming pool which included renovation of the existing pool, along with provisions for ADA accessibility and installation of a sprayground for aquatic recreation (low mod area)
- Improvements to Theodore Park which included new playground equipment and a new concessions building with public toilet facilities and athletic storage areas along with a dedicated fire water line with a fire hydrant for life safety (low mod area)
- Installation of new playground equipment at Denton Park (low mod area)
- Renovations and improvements at the former Woodcock School which is now being utilized as the Therapeutic and Senior Center Facility which will serve the mentally, physically, and learning disabled population of the City of Mobile; work included provision of life safety requirements for the entire building, including fire sprinkler and alarm systems as well as plumbing and electrical system upgrades (low mod area)
- Improvements to the Rickarby Park wading pool in order to make it ADA compliant (low mod area)
- Installation of a new sign at Craighead Elementary School which will serve as a communication tool with parents and neighbors in this low mod area
- Installation of new benches at Morningside Elementary School which will improve safety for the children during pick up and drop off hours at this school where 96% of students are eligible for free or reduced-price lunch
- Street and parking lot resurfacing for roads and public facilities in low mod areas which utilized 7,600 tons of asphalt
- Engineering survey and planning for storm water drainage improvements for a significantly deteriorated section of South Ann Street (low mod area)
- Renovation and replacement of the Harmon Recreation Center ceiling (low mod area)
- Demolition of 8 identified nuisance, blighted properties

- Minor home modifications performed by Independent Living Center to improve accessibility for handicapped homeowners (25 homes)
- A Neighborhood Revitalization program in District 2 which will allow investors to rehabilitate blighted, single family homes and sell them to qualified low and moderate-income buyers (4 homes)
- Housing rehabilitation for low/mod homeowners:
 - CPD Department, District 3 Program (15 homes)
 - Mobile Historic Development Commission (9 homes)
 - CPD Department, City Wide Program (25 homes)
- Mobile Housing Board's Summer Work Employment Experience Training Program (SWEET-P) provided 36 youth work experience and life skills training
- Created the CPD-operated Community and Business Development Center which will provide small business loans along with technical assistance and training to entrepreneurs and microenterprises
- Awarded Public Services grants to:
 - Boys & Girls Club for after school and summer recreation programs serving 416 low and moderate income youth in Crichton and the surrounding neighborhoods
 - Mobile Housing Board for youth recreation programs at three of its housing developments, operated in partnership with the Girl Scouts of America and the Boys & Girls Club, serving 500 youth
 - Senior Citizens Services who provided services to 2,000 elderly residents of Mobile. Services included mental, emotional, and physical health programs as well as community outreach.
 - United Methodist Inner City Mission who provided a neighborhood outreach program in the Maysville/Oakdale area, serving 785 individuals with recreation programs, youth tutoring and general neighborhood improvement programs.
 - Dumas Wesley Community Center who provided a neighborhood outreach program in the Crichton area, serving 1,500 individuals by facilitating block meetings, individual household visits and job placement assistance.
 - Dumas Wesley Community Center who provided a transportation program, serving 286 seniors with trips to the grocery store, pharmacy, doctor appointments, and other necessary trips.
 - McKemie Place for operational support of an overnight, homeless shelter for women, serving 360 clients.

CDBG-R

- Completed drainage improvements in the Trinity Gardens neighborhood

HOME

- Affordable, new homes constructed for sale:
 - Volunteers of America (6 units)
 - Habitat for Humanity (8 units)
 - MLK Avenue Redevelopment Corporation (8 units)

ESG

- Awarded ESG grants to:
 - The Service Center of Catholic Social Services for homelessness prevention services which assisted 61 persons with emergency payments of rent, mortgage, utilities, and security deposits.
 - Family Promise of Coastal Alabama for assistance to maintain their Interfaith Hospitality Network program to shelter, feed, and nurture homeless families, serving 50 people.

- Loaves and Fish Community Ministries for operational assistance for 15 Place, a day center for homeless people in Mobile, which will serve 800 individuals.
- Penelope House for operational assistance for its program for homeless women and children who have left domestic violence situations, serving 595 individuals.
- Dumas Wesley Community Center's Sybil Smith Family Village for operational assistance for a transitional shelter for homeless women with families, assisting 50 individuals.
- McKemie Place for operational support of an overnight, homeless shelter for women, serving 360 individuals.

The 2012-2013 Selected Local Objectives

The fifth program year will continue to support the following objectives drawn from The 2008 Consolidated Plan's Summary of Specific Annual Objectives:

Housing Objectives

- **DH-1: Availability/ Accessibility of Decent Housing**
- **DH-2: Affordability of Decent Housing**
- **DH-3: Sustainability of Decent Housing**
- **SL-1: Availability / Accessibility of Suitable Living Environments**
- **SL-3: Sustainability of Suitable Living Environments**

Community Development Objectives

- **SL-1: Availability / Accessibility of Suitable Living Environment**
- **SL-3: Sustainability of Suitable Living Environments**
- **EO-1: Availability / Accessibility of Economic Opportunity**

Goals To End Chronic Homelessness

- **Support of Continuum of Care planning activities and operation of the Homeless Management Information System (HMIS)**

Summary of Proposed Outcomes

HUD requires grantees to incorporate performance measurements into annual action plans. Each of the city's objectives corresponds to both a HUD Outcome Category: Availability/Accessibility, Affordability, Sustainability (promoting livable or viable

communities) and one of the HUD Objectives: Decent Housing, Suitable Living Environment and Creating Economic Opportunity.

This is displayed within **Table 2 : Performance Measurement** on the following page.

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<u>Objectives/Outcomes</u>	<u>Funding Source</u>	<u>2012 Goals</u>	<u>Performance Indicator</u>
DH-1 : Availability/Accessibility of Decent Housing			
1. Support the development of affordable housing – rental units	HOME	55	Housing Units
2. Support the development of affordable housing – homeownership units	HOME	6	Housing Units
3. Support the development of CHDO assisted affordable housing – homeownership units	HOME	8	Housing Units
DH-2 : Affordability of Decent Housing			
1. Finance homeownership assistance programs, including down payment assistance and/or soft second mortgages	HOME	50	Households
DH-3: Sustainability of Decent Housing			
1. Modify homes to accommodate persons with special physical needs	CDBG	20	Households
2. Home rehabilitation assistance for low and moderate income homeowners	CDBG	30	Household
SL-1: Availability/Accessibility of Suitable Living Environment			
1. Provide assistance to programs that serve the needs of families and individuals at risk of homelessness	HPRP, ESG	125	Individuals
2. Provide operational assistance to homeless shelters, day facilities, and transitional housing facilities	CDBG, ESG	1,700	Individuals
3. Remedy substandard infrastructure in low mod areas (1 project)	CDBG	500	Individuals
4. Public Park Improvements in low mod areas (1 park)	CDBG	300	Individuals
5. Facility improvements to enhance educational and public facilities in low mod areas (2 facilities)	CDBG	1,250	Individuals
SL-3: Sustainability of Suitable Living Environment			
1. Fund public service activities serving primarily lower income persons and those with special needs	CDBG	5,000	Individuals
2. Provide Fair Housing education and outreach to community	CDBG	500	Outreach / Meetings
3. Consumer credit counseling services for individuals and families	CDBG	75	Households
4. Capacity building and technical assistance for community based development organizations	CDBG	2	Organizations
EO-1: Availability/Accessibility of Economic Opportunity			
1. Support a transitional work training program for people with developmental disabilities	CDBG	61	Individuals
2. Make small business loans and offer technical assistance for entrepreneurs and microenterprises	CDBG	10	Loans
	CDBG	20	Technical Assistance
	CDBG	4	Trainings
3. Youth employment training, including workplace and life skills education	CDBG	50	Individuals

TABLE 2 : Objectives and Performance Measurement

Unmet Objectives and Outcomes

During 2011, the City's HOME program had been decertified and HOME funds had been frozen. With new CPD staff on board during the 3rd quarter of 2011, staff has been working to get the program recertified while simultaneously accepting applications in anticipation of funding availability. The City is creating a platform for nonprofit organizations, private developers and the public sector to partner with the City in meeting its affordable housing needs and neighborhood revitalization goals. The CPD Department has developed a documented management structure, including a written HOME Program manual, policies, procedures, and guidelines that will ensure compliance with the HOME program requirements that funds are used only for eligible activities and eligible costs. The structure delineates tasks required to administer the HOME program and assigned responsibility for the completion of the tasks by CPD staff, Architectural/Engineering staff, and other City staff. In addition, the City's Accounting, Urban Development, and Legal departments provide staff support where necessary. Staff has attended various training to enhance their capacity as needed. CPD staff has been in regular communication with HUD staff to ensure the continued progression of the recertification process.

The lack of access to HOME funds during 2011 has not allowed the City to meet some of its intended housing related goals from the 2011-2012 Action Plan, specifically programs related to the availability and affordability of decent housing. The City anticipates that the release of these funds will allow the City to further accomplish these objectives. This Fifth Year Action Plan includes funding recommendations and goals for \$4,004,093 in HOME funds. This amount represents the anticipated 2012 allocation (\$787,333) along with program income (\$322,782) and the allocations from 2011 (\$1,356,794), and 2010 (\$1,537,184).

Furthermore, the City of Mobile lacks adequate resources to address its old and deteriorating infrastructure, specifically storm water drainage, streetscape, and adequate street paving in its older neighborhoods. Public improvements, specifically in the low and moderate-income neighborhoods, are needed to provide positive benefits to the areas' residents. Also, due to the aging housing stock, the City has a growing inventory of blighted residential structures which has only been made worse with the economic environment of the last three years.

A final unmet objective was the disposition of CDBG properties. As part of the transfer of assets from the Mobile Housing Board, there were a number of properties that were received. These properties consisted of a mix of vacant lots, lots with blighted structures, oddly shaped (undevelopable) strips of land, and some occupied properties. The CPD Department continues to work with the City's Real Estate Department to develop a plan for the eligible use and/or disposition of the subject properties. The CPD Department intends to bundle some of these properties and do a Request for Proposals to solicit proposals from developers who can redevelop the vacant properties.

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low-income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.

The City of Mobile has seven City Council districts. Districts 1, 2, and 3 (in the northeast, east, and southeast portions of the City) have the largest concentrations of poverty, and these are also the districts with the largest minority concentration (see Map 1). However, for the purposes of this Action Plan, projects and programs were extended to all eligible census tracts and households, irrespective of the district.

The City does not currently have clearly defined, targeted redevelopment areas. However, as the City prepares for the drafting of its new Consolidated Plan in 2013, this is an idea that the CPD department would like to put forth during community discussions.

2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215 (a)(1)) during the next year and the rationale for assigning the priorities.

For City-wide projects, the City used a competitive application process with funding open to all agencies addressing the needs identified in the 2008 Consolidated Plan document. CDBG and ESG applications are scored by three separate reviewers, and requests are scored utilizing a matrix that evaluated community need, program description and effectiveness, agency management, and financial management. HOME applications are scored by three separate reviewers, and requests are scored utilizing a matrix that evaluated needs and population served, conceptual soundness, organizational capacity, financial and economic feasibility, and readiness.

Additionally, CPD staff reviewed the following:

- Project eligibility/compliance with federal regulations
- Clear linkage to a Consolidated Plan priority or City priority
- Benefit to low and moderate-income persons or neighborhoods
- Past performance of the applicant (if prior funding has been received)

The City does not currently have targeted neighborhoods for revitalization work; however, preliminary work in Africatown and MLK Avenue corridor, and the Bottom/Campground areas is underway. Districts 2 and 3 have been targets for residential rehabilitation projects.

3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

As previously described, CPD staff is working to have the City's HOME Program recertified. If the funds from prior years are released, this would allow the city to partner with developers and develop a variety of affordable housing programs which would produce sorely needed units and make existing units more decent, affordable to low and moderate-income individuals and families.

During 2012, the City of Mobile will begin the process of drafting its 2013-2018 Consolidated Plan. The CPD Department would like to see this document lay out a strong and clear vision of where the City of Mobile would like to go with its entitlement programs. To those same ends, the City will work to identify areas within the City in which revitalization efforts will be targeted, so that maximum impact can be achieved.

Another development which will help meet the needs of small businesses and emerging microenterprises is the Community and Business Development Center. This program of the CPD Department is designed to enhance economic development opportunities, especially in

low to moderate-income areas and to foster growth and development of small businesses. Activities and services will include, but are not limited to, a small business assistance loan program, one-on-one technical assistance in small business ownership, and the development and implementation of comprehensive small business entrepreneurial training and workshops for low and moderate-income businesses in the City. The program is also geared toward helping low and moderate-income entrepreneurs reach financial self-sufficiency and business success. The overall outcome of the economic development program will be an increase in financial support for small businesses, a sustainable increase in job creation and retention, and increased economic development in low and moderate-income areas of the City of Mobile.

The Analysis of Impediments to Fair Housing Choice study is underway. When completed and implemented, it would provide an opportunity for the City to address its housing discrimination challenges.

4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

The City received two Federal American Recovery and Reinvestment Act of 2009 (ARRA) grants in 2009: Homelessness Prevention and Rapid Re-Housing Program (HPRP) funds and Community Development Recovery (CDBG-R) funds. The City will continue to administer the programs funded until the grants expire in July 2012.

The local Continuum of Care (CoC), which includes Mobile and Baldwin counties was awarded McKinney-Vento Homeless Assistance Acts programs for Supportive Housing Program (SHP) and Shelter Plus Care (S+C) grants. As of January 1, 2012, the annual amount of funding assigned to the City of Mobile as a result of this application process was \$1,849,139 or 53.3% of the \$3,469,456 total awarded to the three-jurisdiction CoC.

The CPD Department received a HOME application to provide gap funding for a 14-unit, HUD 811 project being developed by Volunteers of America Southeast to serve individuals with chronic mental illness and/or developmental disabilities. The application is currently being underwritten.

Federal Emergency Solutions Grant (ESG) funds are matched by the City's subrecipients in the form of volunteer hours, in-kind or cash donations, and the value or fair rental value of any donated material or building.

The HOME Investment Partnership Program also requires a 25% local match. The City has a dedicated fund which is set aside for this purpose. The City will also periodically supplement CDBG-funded projects with capital funds from the City if the bids on a project come in higher than expected.

Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.

As of January 1, 2011, the City assumed administration of its HUD-funded entitlement grant programs, previously administered by the Mobile Housing Board. During the second quarter of 2011, the City hired an Administrative staff person and began the formation of a new Community Planning and Development (CPD) Department which will administer the City's HUD funds, ensuring that entitlement funds are used in accordance with all program requirements. A Director of the CPD Department was hired in June 2011, and an Assistant Director of the CPD Department was hired in August 2011. Additional staff hired during the third and fourth quarters of 2011 included a Grants Developer, a Housing Rehabilitation Coordinator, an Economic Development Coordinator, and a second Administrative staff person. The Community Planning and Development Department continues to work with the employees of various other City departments who have coordinated the transition from Mobile Housing Board.

2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.

The following activities supported public participation:

- **October 14, 2011** -- Public Notice of availability of anticipated 2012-2013 entitlement grant funding, the date of the first public hearing, and the date of the grant application workshop (see Appendix D for a copy of the public notice);
- **October 26, 2011** – Public Hearing, 4:00 pm, Mobile Government Plaza – Public comments were solicited on the City's past performance and plans for FY2012; *The public hearing was attended by nonprofit social service organizations, local interested citizens, for profit developers, City staff, nonprofit developers, public housing authority staff, and local businesses.*
- **October 31, 2011** – CDGB/ESG grant application workshop provided detailed application instructions and technical assistance;
- **November 14, 2011** – Public Notice of HOME funding availability and the date of the application workshop;
- **November 18, 2011** -- Deadline for accepting applications for CDBG/ESG grant funding;
- **November 18, 2011** – HOME funding application workshop providing details and instructions on HOME regulations and application requirements;
- **November 21, 2011** – **December 12, 2011** – City review of CDBG/ESG applications;
- **December 22, 2011** – Deadline for accepting HOME funding applications;
- **December 27, 2011** – **January 13, 2012** – City review of HOME applications;

- **January 10, 2012** – Review of funding recommendations by the City Council’s Entitlement Committee;
- **January 20, 2012** - Public Notice of the availability of the Draft of 2012 Action Plan including the recommended projects/activities for public review and comment for period of 30 days (a copy of the published notice is found in Appendix B);
- **February 15, 2012** – Public Hearing, 3:00 p.m., Mobile Government Plaza – Public comments will be solicited on the City’s Draft 2012 Action Plan;
- **February 19, 2012** – End of 30-day Comment Period;
- **March 6, 2012** – FY 2012 Action Plan approved by City Council;
- **March 8, 2012** – FY 2012 Action Plan submitted to HUD;
- **May 1, 2012** – FY 2012 program year begins.

3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

The City will continue to expand partnerships with the private sector and nonprofit agencies through fund leveraging and collaboration in seeking low income housing tax credits (LIHTCs) that keep housing affordable for low and moderate-income individuals and families. The City will coordinate other pertinent planning activities with non-City agencies at the local and regional levels.

The Director of the CPD Department joined the Board of Directors of Housing First, the lead agency of our local Continuum of Care. This will allow a better flow of information, ideas, and planning with a broad array of housing and social service providers in the City of Mobile. The City will also continue to cooperate with the Mobile Housing Board, the City’s public housing authority, to plan and coordinate services and housing alternatives for public housing residents. Preliminary discussions between the City, the Mobile Housing Board, and a private developer regarding the redevelopment of Roger Williams Public Housing are underway.

As part of the planning for the City’s upcoming 2013-2018 Consolidated Planning process, the CPD Department intends to solicit input from a wide variety of individuals and organizations from the public, private, and nonprofits sectors along with elected officials and representatives from the Mobile Housing Board so that a balance of perspectives can be brought to the plan.

The CPD staff is looking at community partnerships with local colleges and universities where students could be utilized in community outreach and service capacities. Additionally, the CPD Department is pursuing partnerships with banks as part of leveraging the City’s resources, and as a way to involve banks in neighborhood revitalization initiatives.

CPD staff has also been working through consultants to secure HUD Technical Assistance funding for Community Housing Development Organizations (CHDOs) and nonprofit developers as a way to build their capacity. HUD Consultants are currently providing Technical Assistance to NSP Subrecipients on the creation of a Lease Purchase Program.

Citizen Participation

1. Provide a summary of the citizen participation process.

The City of Mobile maintains a Citizen Participation Plan which describes the process citizens may follow to participate in the development of the Consolidated Plan, Action Plan and to comment on grant-funded activity performance outcomes reported to the U.S. Department of Housing and Urban Development (HUD). This process includes publication, a public hearing, reasonable and timely access for review of plans, participation for non-English speaking citizens and a process for receiving complaints and grievances. The Citizen Participation Plan also outlines the steps which must be followed in the event that the purpose or funding of a project will change significantly (i.e. more than 51% of its initially funded amount).

2. Provide a summary of citizen comments or views on the plan.

Minutes from the public hearing on February 15, 2012 can be found behind Tab 2, and minutes from the public hearing on October 26, 2011 can be found behind Tab 5. Based on a written comment, we incorporated language regarding Habitat for Humanity as a potential mortgage lender on page 20 of the Action Plan. Another written comment requested that the City consider creating a forgivable second mortgage product and closing cost assistance which would be made available to persons acquiring homes developed with HOME funds. CPD staff responded that we would work with developers and buyers to create appropriate products that balanced the affordability needs of buyers with the City's need to maximize the use of the limited HOME funds.

3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.

The CPD public hearing and application workshops were held at Government Plaza which is centrally located in downtown Mobile. The building has easy access to public transportation and ADA accommodations. Notices were published on the City's website located at www.cityofmobile.org. Public notices were also circulated to community partners such as the United Way and the Community Foundation of South Alabama so that they could be more widely advertised through their contacts.

CPD staff continues to work closely with members of the City Council so that they are aware of opportunities and can communicate directly with their constituents. CPD staff also attends City Council district meetings to discuss programs and project implementation relating to the Consolidated Plan.

The CPD Director has also met with staff from the City's Neighborhood Services department. This department is in close contact with neighborhood associations, and through these contacts, the CPD can disseminate information even further throughout the community.

4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

We accepted all comments.

Institutional Structure

1. Describe actions that will take place during the next year to develop institutional structure.

Over the years, the City has partnered with a number of nonprofits, faith-based organizations, governmental agencies, and the public housing authority to accomplish the goals of the Consolidated Plan. The nonprofits include emergency shelters, housing developers, social service providers, volunteer agencies, economic development centers and community development organizations. Specific community partners for the 2012 Action Plan are found in Appendix B.

The CPD Department has done outreach to local financial institutions to foster partnerships with the City and as a means to leverage entitlement funds for greater impact in the community. As a way to grow local capacity, the CPD Department is proposing to use funds in 2012 for capacity building and technical assistance for community based development organizations in the City. Table 3 shows the partners that would make up the institutional structure.

TABLE 3 : Institutional Structure

City of Mobile	Program administration and oversight
	Direct project implementation
	Program monitoring and reporting
	Create and evaluate applications, set policy
Nonprofit Organizations	Direct provision of services
	Planning and evaluation
Mobile Housing Board	Provides matching funds for services to public housing residents
	Project implementation
	Affordable housing statistics
Banks	First mortgage assistance
	Co-investment on development projects
Developers (Nonprofit and For Profit)	Housing creation for low and moderate-income households
	Analysis of trends
Quasi-Public Agencies : Trade Organizations, Chamber of Commerce, Colleges, Mobile County, Board of Education, etc.	Minority business opportunities, small business development, broader public policy social issues
Housing First	Lead agency for the local Continuum of Care (CoC) and homeless services and coordination

Monitoring

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

The City of Mobile, on a continuous basis, strives to improve its established monitoring system of CDBG, ESG and HOME housing and community development activities to ensure both short-term and long-term contract and regulatory compliance. Monitoring of the CDBG, ESG and HOME program is the responsibility of the City's Community Planning and Development (CPD) Department.

The monitoring approach for projects' implementation by subrecipients is more elaborate than the projects implemented by the City departments due to a higher risk of non-compliance by subrecipients.

Subrecipient Projects

Monitoring of subrecipient projects has five major components:

1. **Grant Application:** Requests for funding are made on a standard application form and are carefully reviewed and evaluated. Points are given for each of the criteria, covering community need, program effectiveness, agency capacity, and track record. Recommendations for funding are based on the resulting scores. Ineligible projects are screened out prior to the start of the evaluation process. For HOME projects, there is increased underwriting and analysis of developer capacity.
2. **Contractual Agreement:** The City enters into a two-part contractual grant agreement with each subrecipient. Part I of the agreement describes the tasks to be performed with the grant funds, the results to be achieved, and other conditions specific to the project. Part II lists all federal standards with which the agency must comply. Each funded activity is assigned to a Grants Developer or Analyst in the Community Planning and Development Department. The Grants Developer conducts periodic and on-site monitoring visits a year to review for contractual and regulatory compliance.
3. **Monitoring Records:** For each subrecipient, staff maintains monitoring records that include the following:
 - a. Basic information.
 - b. Monitoring Plan. A risk assessment is carried out to determine the appropriate frequency of on-site visits, and the areas to be reviewed, including some or all of: financial management, client eligibility, program effectiveness, property, procurement, program income, fair housing, and equal opportunity.
 - c. Subrecipient training and technical assistance provided.
 - d. Review of the agency's annual CPA audit.
 - e. Monthly financial reports and draw requests for the subrecipients.
 - f. Monthly programmatic reports.
 - g. On-site monitoring reports.
 - h. Correspondence and notes of significant telephone conversations.
4. **On-Site Visits:** Staff performs on-site monitoring reviews one or two times a year, depending on the assessment of risks for non-compliance. Program operations are

observed, subrecipient staff interviewed, client eligibility confirmed, and financial and programmatic reports verified from original documentation.

5. **Long-term Compliance:** Activities involving real property acquisition or improvement require long-term compliance with the original purpose of the federal assistance. The City maintains a CDBG Real Property Inventory that is updated annually, and confirms that such property is still being used for the intended purpose. The City will carry out an annual review of HOME-assisted rental units, to ensure compliance with the Housing Quality Standards, tenant eligibility, and rent ceilings.

The Community Planning and Development staff is developing written guidelines for monitoring subrecipients to ensure more uniform and comprehensive reviews.

City-implemented Projects

The Community Planning and Development Department monitors federally-funded projects that are implemented by other City Departments through a simple project tracking and management reporting system. This process includes monthly management reports, frequent inter-departmental meetings on projects updates and reports, and financial reports. Project expenditures are compared with budgets on a monthly basis. Community Planning and Development also executes Memorandum of Understanding (MOU) with certain City departments.

The City relies heavily on standard operation procedures (SOP) that have been designed to be in compliance with federal regulations, for example, its purchasing policy. In addition, the City departments ensure that all City construction contracts are performed in accordance with federal Labor Standards and Section 3 requirements.

HUD monitoring and the City's Single Audit provide annual independent checks on compliance by both the City Departments and subrecipients.

Lead-based Paint

1. **Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.**

Through the City's residential rehabilitation programs, funds may be used to help low and moderate-income homeowners stabilize or abate lead-based paint hazards. The CPD Department recognizes the importance of addressing lead-based paint hazards, especially in a city like Mobile, with its older housing stock, much of which is concentrated in low and moderate-income neighborhoods. During the 2012-2013 program year, CPD staff plans to evaluate the potential implementation of a structured lead-based paint abatement program, which would utilize available federal and state resources.



Specific Housing Objectives

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.

The following projects draw from the 2008 Consolidated Plan, the Mayor's Strategic Plan, and the City of Mobile's "New Plan for Mobile," completed in 2010 and adopted in January 2012:

DH-1: Availability/Accessibility of Decent Housing

- New construction and/or rehabilitation of affordable single family homeownership and multifamily rental housing units

HOME funds will be utilized to develop affordable, multifamily rental units and affordable, single family homeownership units. Development partners will be selected through a competitive application and underwriting process.

DH-2: Affordability of Decent Housing

- Finance homeownership assistance programs, including down payment assistance and/or soft second mortgages for eligible low and moderate-income homebuyers

HOME funds will be utilized by the City's CPD Department to assist qualified low and moderate-income homebuyers with the purchase of a home. Assistance could come in the form of down payment and closing cost assistance or the provision of a "soft" second mortgage.

DH-3: Sustainability of Decent Housing

- Modify homes to accommodate persons with special physical needs

CDBG funds will be utilized by Independent Living Center to assist homeowners with disabilities to undertake minor modifications to their homes for improved accessibility. These modifications can include wheelchair ramps, the installation of grab bars, the widening of doorways, and bathroom modifications.

- Home rehabilitation assistance for low and moderate-income homeowners

CDBG funds will be utilized by the City's CPD Department to assist qualified low and moderate-income homeowners in completing rehabilitation work on their homes, focusing on health, safety, and security issues. The City's Historic Development Department will also utilize CDBG funds to administer a roofing program which will assist qualified low and moderate-income homeowners with obtaining a secure, new roof on their homes.

SL-1: Availability / Accessibility of Suitable Living Environments

- Support transitional housing facilities and homeless shelters along with the support services offered by nonprofit emergency shelter organizations
- Provide homeless prevention assistance for individuals and families facing immediate risk of homelessness

The Service Center of Catholic Social Services will utilize ESG funds for homeless prevention services, which will include direct emergency payments of rent, mortgage, utilities, and security deposits for people at immediate risk of homelessness.

Dumas Wesley Community Center will utilize ESG funds for the operation of Sybil Smith Family Village, a transitional housing facility for women with children. As part of the program, clients at Sybil Smith Family Village must obtain a job or be attending school.

Penelope House Family Violence Center will utilize ESG funds for its Victims' Assistance Services Program, a central program at Penelope House, a shelter for women and their children who have escaped domestic violence situations.

Loaves and Fish Community Ministries will utilize ESG funds for the operation of 15 Place, a day facility for the homeless population of Mobile. 15 Place provides lunch, showers, laundry, hygiene kits, payee services, transportation, assistance with application for benefits, clothing, and telephone/computer/mail access for clients.

McKemie Place will utilize CDBG and ESG funds for the operation of the McKemie Place shelter, an emergency overnight shelter for women, operated in partnership with United Methodist Inner City Mission.

Housing First will continue to utilize HPRP funds to prevent homelessness and rapidly re-house those individuals and families who have become temporarily homeless. This grant will continue through July 2012.

SL-3: Sustainability of Suitable Living Environments

- Provide Fair Housing education and outreach to the community
- Financial education for individuals and families
- Continuum of Care activities

CDBG funds will be utilized by the Mobile Fair Housing Center to conduct a series of outreach and education activities for the community on issues related to fair housing. The Mobile Fair Housing Center plans a mixed campaign of television, radio, community meetings in each of the City's seven City Council districts, and meetings for local people engaged in community development, affordable housing, and neighborhood revitalization throughout the City. The City will complete its Analysis of Impediments to Fair Housing Choice and begin implementation of the recommended strategies.

Family Counseling Center of Mobile will utilize CDBG funds to provide financial education to low and moderate-income individuals and families.

CDBG and ESG funds will be utilized by Housing First for Continuum of Care (CoC) planning activities and the administration of the Homeless Management Information System (HMIS). Housing First is the lead agency for the area's CoC, and through this role, Housing First coordinates planning and communication between service providers.

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

The City leverages federal resources with private and public sector resources. All ESG subrecipients are required to match the federal funds, dollar for dollar, with their own resources. The HOME Investment Partnership Program also requires a 25% local match. The City has a dedicated fund which is set aside for this purpose. Additionally, the City also provides funding to many of CPD subrecipients through service/performance contracts. Our community partners listed in Exhibit B received a combined total of \$810,010 in performance contracts from the City in the most recent year.

Low and moderate-income homebuyers must finance their first mortgage through private lenders. Developers of all housing will be required to leverage HOME funds with other resources.

The City competes annually for 2-year ESG funding grants from the Alabama Department of Economic and Community Affairs (ADECA). FY 2010 funds were awarded and are nearly expended. The City's 2011 ADECA ESG application was not funded. However, the City has received technical assistance from ADECA staff to better understand how to develop a competitive application. The City intends to apply for ADECA ESG funds in the spring of 2012 for a two-year grant which will run through 2014.

Needs of Affordable Housing (formerly known as Public Housing)

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in home ownership.

The Mobile Housing Board is developing a more aggressive and comprehensive strategy to encourage its residents to participate in home ownership. Public housing residents are also eligible for various programs that the City of Mobile offers. Many of the public housing developments are located within the City's low and moderate-income areas. The City of Mobile, utilizing the HOME program, will provide greater opportunities for home ownership for public housing residents by placing additional affordable houses into the marketplace.

The City of Mobile offers many services to public housing residents. Among the services offered are youth leadership development and recreational activities through the Boys and Girls Club and the SWEET-P program, which focuses on job training.

2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

N/A

Barriers to Affordable Housing

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

In the first quarter of 2012, the CPD Department will utilize CDBG funds to enter into an agreement with an independent company to complete an "Analysis of Impediments to Fair Housing Choice" (AI) study for the City of Mobile. The consultant expects to deliver the completed study during the second quarter of 2012. The AI will not only identify the impediments, but also suggest strategies to overcome them. The results of the AI will also help shape some of the discussion as the City prepares to undertake the 2013-2018 Consolidated Plan process.

In addition to a general lack of affordable housing units (both rental and ownership), there is sometimes a mismatch as to where people want to live, and the variety of housing options in those neighborhoods. One of the issues that the CPD Department wants to focus on is infill housing opportunities in neighborhoods where there are vacant lots available and where new investment can act as a catalyst for other types of neighborhood revitalization. This will act as a complement to the down payment assistance program which provides a qualified buyer the freedom to choose a location.

Another barrier is a lack of potential buyers' financial management and homeownership skills. The City will use HOME funds for construction of affordable homes and down payment assistance, and CDBG funds for pre and post-purchase counseling so that buyers qualify for first mortgages and have the skills and knowledge for sustained, successful homeownership.

HOME/ American Dream Down payment Initiative (ADDI)

THE CITY DOES NOT CURRENTLY RECEIVE ADDI FUNDS.

1. Describe other forms of investment not described in § 92.205(b).

N/A

2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.

Whenever homebuyer assistance is provided, the City guidelines for the investment of HOME funds during the prescribed period of affordability will specify the recapture of funds in an amount to be reduced on a pro-rata basis for the time the homeowner has owned and occupied the housing, measured against the required affordability period. Should the homeowner refinance the property any time during the Affordability Period, the full principal and any accrued interest on the City's HOME loan must be repaid.

The mortgage documents will require proportionate sharing of net proceeds sharing with the homeowner when a subsequent sale is less than the full amount of the HOME subsidy. Net proceeds means the sales price minus homeowner down payment, principal payment, any

capital improvement investment, and closing costs. The net proceeds will be divided proportionately as follows:

$$\frac{\text{HOME Investment}}{\text{HOME Investment} + \text{Homeowner Investment}} \quad \times \quad \text{Net Proceeds} = \text{HOME amount to be recaptured}$$

$$\frac{\text{Homeowner Investment}}{\text{HOME Investment} + \text{Homeowner Investment}} \quad \times \quad \text{Net Proceeds} = \text{Amount to homeowner}$$

This provision will be recorded in Probate Court in order to ensure the recapture provisions.

The City will provide up to \$10,000 for down payment and closing cost assistance in conjunction with home purchase to eligible individuals. The amount of assistance provided may not exceed \$10,000 or six percent of the purchase price of the home, whichever is greater. To be eligible, individuals must be first-time homebuyers interested in purchasing single family housing. A first-time homebuyer is defined as a household that has not owned a home during the three-year period prior to the purchase under this program. Additionally, individuals must have incomes not exceeding 80% of area median income.

Applicants will be expected to demonstrate they can meet minimum mortgage underwriting requirements of an FHA-approved mortgage lender. Comparable underwriting requirements used by other lending organizations such as Habitat for Humanity of Southwest Alabama will be evaluated for approval by CPD staff in consultation with HUD staff as needed. Applicants must provide evidence of having successfully completed a recognized home buyer training program. Homebuyers must occupy the property as their principal residence.

3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b).

The City of Mobile does **not** use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds.

4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:

- a. Describe the planned use of the ADDI funds.
- b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
- c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

The City has not been informed by HUD that any ADDI funds will be included in the 2012 Program Year budget.

Specific Homeless Prevention Elements

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction’s plan for the investment and use of funds directed toward homelessness.

The City will dedicate CDBG, ESG, SHP, S+C, and HOME funds for this purpose. The City is a participating jurisdiction in the Continuum of Care (CoC) for Mobile, Mobile County and Baldwin County, Alabama (AL-501). Table 4 shows the ten agencies that will share in the \$1,849,139 allocated to the City.

TABLE 4 : Funding for Participating Agencies in the CoC

	Agency / Sponsor	Project	City of Mobile
1	AltaPointe Health Systems	Chronic Permanent Housing	223,584
2	Loaves and Fish Community Ministries	15 Place Day Center	246,720
3	Penelope House	TLC Transitional Housing Families	88,005
4	Dumas Wesley Community Center	Family Village Transitional Housing	98,172
5	Housing First, Inc.	Victory Permanent Housing Disabled	96,331
6	Family Promise	Case Management Families	47,063
7	St. Mary’s Home	Transitional Housing Young Adults	89,537
8	The Salvation Army	Project Able	57,043
9	Service Center Catholic Social Services	Permanent Housing Disabled	105,387
10	Housing First, Inc.	Victory Transitional Housing Families	54,351
11	Franklin Primary Health Center	Substance Abuse Treatment Women	74,082
12	Housing First, Inc.	Community Housing Program	266,948
13	Franklin Primary Health Center	Franklin Case Management	51,832
14	Housing First, Inc.	Homeless Management Information System	58,485
15	Housing First, Inc.	Gateway II	67,320
16	Housing First, Inc.	Gateway III	74,330
17	AltaPointe Health Systems	Shelter Plus Care	149,949
		TOTAL	\$1,849,139

To meet cash match requirements for SHP grants that range from 20% to 25%, these organizations will apply funding acquired through City performance contracts, United Way allocations, foundation grants, ESG, CDBG awarded by the City and the Alabama Department of Economic and Community Affairs, and other funds generated by the project sponsors.

According to Housing First, leveraged support of approximately \$5.1 million is provided by other community resources including Social Security Administration payments, VA benefits and health care, Medicaid, unemployment benefits, food stamps, mental health services, substance abuse treatment, transportation services, child day care services, volunteers' support and agency administrative support.

The City was awarded \$1,186,394 in HPRP funds in 2009. This program will conclude by March 2012 and will have provided financial assistance and services to 160 households for either preventing homelessness or help those experiencing homelessness to be quickly re-housed and stabilized. HPRP funds are also used for data collection and evaluation as well as administrative costs. The City contracts with Housing First, Inc. to administer HPRP funds. Housing First, in turn, contracts with local organizations for case management services, legal services for preventing evictions, and credit counseling.

The City is also in the process of amending its Fourth Year Action Plan (PY 2011-2012) to accommodate the receipt of a second allocation of Emergency Solutions Grant funding. The City expects to receive \$72,864 in this second allocation, and anticipates that these funds will be targeted for homelessness prevention, rapid re-housing, and the administration of the housing management information system (HMIS).

In 2011, Housing First, Inc., as the lead organization for the AL-501 CoC, obtained a U. S. Department of Veteran Affairs grant of \$600,360 for a Supportive Services for Veteran Families Program (SSVFP). This program is modeled after HPRP but is for homeless veterans or those at risk and their families. SSVFP will continue in 2012.

2. Homelessness-In a narrative, describe how the Action Plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.

The 2012 Action Plan activities include funding for outreach/assessment, emergency shelters, transitional housing, supportive housing, homelessness prevention, and independent living which are specific objectives in the Strategic Plan.

Obstacles to completing our activities include, but are not limited to the following: a continuing lack of education and job skills, inadequate funding to develop more permanent supportive housing, language barriers, transportation barriers, child care barriers, mental health or chemical dependency issues, financial and credit issues, physical or sexual abuse, and refusal to accept government assistance. In 2012, the City and the CoC lead organization Housing First, Inc. will facilitate convening the community for the purpose of updating the ten-year plan to end homelessness that was developed in 2005.

3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.

A Homeless Task Force for ending chronic homelessness was convened by the Mayor of the City of Mobile in 2004 and charged with responsibility for developing a 10-year plan to end homelessness. The plan was announced in June 2005.

Goals 1 through 9 were implemented with substantial improvements in the basic procedures for identifying chronic homeless citizens and providing intervention services have been

made. Ninety-seven scattered-site permanent housing units with permanent supportive services have been added since the plan was released in 2005. A HUD application for an additional two units is pending.

The annual Point-In-Time count of the homeless in 2011 indicated that the number of unsheltered chronic homeless had been reduced from 100 in 2006 to 57, a 43% decrease.

The success in addressing chronic homelessness is credited to a "harm reduction" strategy implemented in 2007 for housing those with mental health and addiction disabilities. In 2009, a SAMSHA (HHS) grant for an Act Team was secured for \$400,000 annually over five years to provide intervention, psychiatric and addiction treatment services for maintaining chronic homeless citizens in housing. By 2011, the success rate for keeping chronic homeless citizens in permanent housing had risen from 65% to 90%.

Goal 10 called for obtaining memoranda of understanding from institutions, criminal justice facilities, hospitals and government agencies regarding procedures to prevent discharge of individuals into homelessness. There has been limited success in this area; only a few entities have adopted policies that officially prohibit homeless discharge. See sections, below.

Goal 11, calling for an intervention and opportunity center to prevent and end homelessness, was placed on hold due to limited community resources. The 2011 Action Plan provided for \$200,000 in CDBG funds as City start-up funding for this complex. Remaining funds are to come from third party nonprofits, community foundations, and private fundraising efforts. A site has been acquired by the Waterfront Rescue Mission for the center in partnership with 15 Place, the daytime shelter for the homeless that will relocate to the site. During the fall of 2011, it was announced that Franklin Health Center will also open a clinic on the campus to assist with comprehensive treatment for clients. The center is projected to open during the summer of 2013 and will include day and overnight facilities as well as an array of case management services along with mental and physical health services. The entire campus is projected to be a \$5 million development in downtown Mobile.

The CoC plan for addressing chronic homelessness includes these 2012 initiatives:

1. Adding 10 chronic homeless housing units
2. Using 20% of newly-developed housing as rental properties for the chronically-homeless
3. Signing MOU's with area PHAs for accessing three housing units annually for the transfer of chronically-homeless residents who are ready for more independent living
4. Coordinating with members of the downtown business community and the Mobile Police Department in a continuing effort to identify the chronically-homeless and develop intervention plans, including outreach and case management.

According to Housing First, it is not possible to end chronic homelessness in 2012. Two major setbacks, Hurricane Katrina and the global economic downturn beginning in 2008, have impeded progress. Even with the expected addition of 10 housing units in 2012, another 47 units could be needed in 2012 to house individuals currently identified as chronically homeless.

Housing First has also reported an increase in the number of homeless veterans in the area. Seventy-two (72) homeless veterans attended the most recent Stand Down for Homeless Veterans event which was held on October 13, 2011 along with another 17 veterans who were at risk of becoming homeless. Housing First implemented a new VA grant on Oct 1, 2011 – the Supportive Services for Veteran Families Program which is projected to serve and prevent homelessness for 110 veteran households, individuals and those with families.

Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.

The City’s current homeless service delivery system focuses on treating homelessness after it occurs. The newly-planned “opportunity center and complex” will play a key role for preventing homelessness because it centralizes services and will offer both daytime and overnight housing.

The City will continue to use the balance of its HPRP funds (\$188,179 as of January 1, 2012) according to the following budget:

TABLE 5 : HPRP Budget

HPRP Activity	Original Budget	Amended Budget (Approved 11/01/11)
Administration	\$ 59,320.00	\$ 59,320.00
Financial Assistance – Prevention	\$ 423,836.00	\$ 444,139.54
Financial Assistance – Re-Housing	\$ 288,000.00	\$ 90,418.99
Relocate/Stabilize – Prevention	\$ 142,367.00	\$ 346,376.91
Relocate/Stabilize – Re-Housing	\$ 213,551.00	\$ 148,663.83
Data/Evaluation	\$ 59,320.00	\$ 97,474.73
TOTALS	\$ 1,186,394.00	\$ 1,186,394.00

The CoC lead organization, Housing First, Inc. implemented a VA project for preventing veterans and their families from becoming homeless or facilitating rapid re-housing if required. Known as the Supportive Services for Veteran Families Program, it is projected that 100 veteran households will be served in 2012. This \$600,360 grant is subject to annual renewal based on successful operation.

Other agencies providing services to prevent homelessness include:

- The Family Promise program partners with churches in the City to prevent homelessness, when possible, and to provide temporary shelter, if necessary.
- The Salvation Army and Dumas Wesley Community Center operate transitional facilities for women and their children.
- Penelope House continues to successfully operate a transitional housing program for victims of domestic violence.
- McKemie Place continues to offer emergency shelter for single women.
- The Salvation Army and Waterfront Rescue Mission will continue to offer emergency shelters for men.

4. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

The City of Mobile adopted the following Discharge Policy Statement for Homeless Citizens in March 2007:

“It is the policy of the City to prevent homelessness by encouraging local and publicly funded institutions or systems of care to contact Housing First, Inc., the Homeless Coalition for discharge planning consultation and assistance regarding citizens known to be homeless or who could become homeless at the time of discharge.”

Housing First, Inc., provides discharge planning consultation services and will continue to do so in 2012. A status summary follows:

Discharge from Foster Care

The Mobile County Department of Human Resources, a state child welfare agency, has formal, written discharge policies for foster care. Its discharge plan calls for reunification with family whenever possible, supported by state funds. For those aging out of the system, planning assistance and case management services are provided. The discharge plan includes a mandatory 6 month follow-up, and at the client’s request, may continue follow-up for up to 18 months.

Discharge from Health Care Facilities

Four major health care organizations provide inpatient services in the City: Infirmary Health Systems, Providence Hospital, University of South Alabama Medical Center and Spring Hill Medical Center. None has a discharge policy or protocol specific to homeless patients.

The following procedures have been recommended, and will continue to be recommended by Housing First:

- Patients identified as homeless at the time of admission or acceptance for healthcare services, or who become homeless during the period of active treatment, are to be provided discharge planning that prevents being released into homelessness whenever possible.
- Patients accepted for inpatient treatment without an address are to be reported to the discharge planning office of the healthcare organization at the time of admission.
- The discharge plans developed by healthcare organizations should include any special considerations or procedures that are needed for homeless patients.
- A patient should not be discharged to the streets and cannot be discharged to an emergency shelter unless the patient is physically and mentally competent, requests that action, and the shelter has been notified and agreed to accept the patient.

The four health care organizations will continue to be reminded, annually, of these recommended policies and reminded that McKinney-Vento funds are not meant to be used for discharge from inpatient care to transitional and permanent housing except under very specific circumstances that determine eligibility.

Discharge from Mental Health Facilities

State and federal law prohibits discharge from mental health facilities that would result in homelessness. Alabama operates transitional and group homes for patients needing follow-up care and housing at the time of discharge from inpatient treatment.

Discharge from Corrections Facilities

The State of Alabama Department of Corrections requires an address for prisoners who are released on probation. Prisoners who have completed their sentences and will not be on probation are released without the requirement of a follow-up address. Released prisoners are, therefore, not deemed homeless.

However, released prisoners are at significant risk of becoming homeless if they, in fact, are not homeless at the time of discharge. Statistical information collected by 15 Place, a homeless daytime service center in Mobile, indicates that a significant number of released prisoners become homeless within three months. In 2008, Governor Bob Riley implemented an initiative known as the Community Partnership for Recovery and Reentry Network, which created a network of faith-based and community organizations to evaluate the needs of discharged prisoners for rehabilitation services and housing assistance. The effectiveness of this network has not yet been determined.

The Mobile County Metro Jail has not fully developed a formal protocol for releasing homeless prisoners. Housing First has recommended, and will continue to recommend, the following protocol to the jail:

1. Mentally-ill prisoners without an address at the time of incarceration and who are scheduled to be released should be reported to the AltaPointe Health Systems worker assigned to the Metro Jail.
2. Housing First, Inc. should be asked to participate in the development of a discharge plan for eligible homeless individuals being released.
3. Housing First, Inc. will provide information regarding rehabilitation and transitional housing programs that could be offered at the time of release. It is understood that HUD McKinney-Vento funded housing should not be considered until all other resources have been explored and the history and background of a specific prisoner verifies eligibility and suitability.

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Community Development

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.

The following projects draw from the 2008 Consolidated Plan, the Mayor's Strategic Plan, and the City of Mobile's "New Plan for Mobile," completed in 2010 and adopted in January 2012:

SL-1: Availability / Accessibility of Suitable Living Environment

- Remedy substandard infrastructure in low and moderate-income areas
- Improve public parks in low and moderate-income areas
- Facility improvements to enhance educational and public facilities in low and moderate-income areas
- Homeownership education and counseling

CDBG funds will be utilized by the City's Engineering Department to make drainage improvements at Trinity Gardens Park, located in a low-income area.

The City's Architecture Engineering Department will utilize CDBG funds to make continued improvements at Theodore Park, located in a low and moderate-income area. CDBG funds will also be utilized to complete renovations to the African American Archives building. Work will include the installation of new windows and repairs to the plaster ceiling.

CDBG funds will also be utilized by the City's Architecture Engineering Department to make continued improvements and modifications at the former Woodcock School which has been transformed into a community education resource center for seniors and people with disabilities.

HOME funds will be utilized by a community partner to provide homeownership education and financial counseling to low and moderate-income individuals who are interested in purchasing a home.

SL-3: Sustainability of Suitable Living Environment

- Public service activities serving primarily lower income persons and those with special needs
- Capacity building and technical assistance for Community Based Development Organizations (CBDOs) to enhance their capacity to serve as active development partners in neighborhood revitalization activities

The Boys and Girls Clubs of South Alabama will utilize CDBG funds to provide youth education and recreation programs for children ages 6-18. Funding will support the operations of the Kiwanis Boys and Girls Club as well as three Boys and Girls Clubs locations at the following Mobile Housing Board public housing developments: Roger Williams, R.V. Taylor, and the Birdville/Mae Eanes area.

Dumas Wesley Community Center will utilize CDBG funds to support the operations of their neighborhood outreach program which serves the Crichton community, an area that is comprised of approximately 64.2% low and moderate-income households.

Senior Citizens Services will utilize CDBG funds to support the operations of Via, a multi-purpose center dedicated to the physical, mental, and social health of senior citizens in the City of Mobile.

United Methodist Inner City Mission will utilize CDBG funds to support the operations of their community enrichment program which serves the Oakdale/Maysville community, an area that is comprised of approximately 81.2% low and moderate-income households.

The CPD Department will utilize CDBG funds to provide capacity building and technical assistance for community based development organizations (CBDOs). The goal is to strengthen the organizational structure and capacity of groups in low and moderate-income areas, allowing them to develop to a higher level of functionality in the community.

EO-1: Availability / Accessibility of Economic Opportunity

- Support a transitional work training program for people with developmental disabilities
- Provide small business loans and training for microenterprises
- Youth employment training

Mobile Association for Retarded Citizens will utilize CDBG funds to support the Transitional Work Training Program for people with developmental disabilities who are 18-25 years old and aging out of the school system. The program will focus on job readiness and life skills.

The CPD Department will utilize CDBG funds for its Community and Business Development Center which will provide loans, training, and technical assistance to microenterprises.

Mobile Development Enterprises will utilize CDBG funds to support the Summer Work Employment Experience Training Program (SWEET-P) which provides training to low and moderate-income individuals ages 16-23. This activity provides summer work experience, job readiness, life skills training, and work place environment education.

2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

Short Term Objectives

- Improved quality and quantity of affordable housing stock

- Improved community services in low and moderate-income areas
- Provide assistance to small businesses that would lead to job creation and retention
- Increased capacity of community based development organizations
- Increased financial knowledge and skills for low and moderate-income individuals
- Improved educational and recreational facilities in low and moderate-income areas

Long Term Objectives

- Greater housing choice for low and moderate-income households, both in location and price
- A stronger nonprofit development community and stronger neighborhood organizations
- Increased economic opportunities for low and moderate-income individuals and the businesses they create and operate
- Catalytic community investment which creates a positive “ripple effect” of revitalization in low and moderate-income areas
- Greater opportunities for the creation of wealth and the development of assets for low and moderate-income households
- Coordinated reinvestment in low and moderate-income areas of the City of Mobile

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Antipoverty Strategy

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

The following funded activities should help reduce poverty:

a) Housing and related supportive services for the homeless

Long-term housing promotes household stability which allows household members to focus on a multi-faceted recovery plan.

b) Youth services

Providing after-school and summer youth recreational programs should direct children's and teens' time and efforts into productive activities under the guidance of adult mentors. Such experiences can motivate young people to stay in school and assume control of their futures.

c) Homeownership and financial counseling

Learning to manage finances to accommodate homeownership can help household members budget all resources to stabilize their lives and maintain steady employment. Homeownership would also help families and individuals create wealth.

d) Efforts to avoid eviction or foreclosure

Through the HPRP and ESG programs, agencies such as Housing First and the Service Center of Catholic Social Services, provide small grants for utility bills, security deposits, and delinquent mortgage and rent payments to keep people in their homes and avoid slipping into homelessness.

e) Services for seniors

Many seniors live on fixed incomes and have limited access to transportation and socialization. Senior services will seek to improve the quality of seniors' lives and free up limited resources for other essential needs.

f) Affordable housing

The CPD Department's affordable housing program targets households at or below 80% of area median income (AMI), with many programs targeting households at or below 50% AMI. These programs seek to reduce the housing cost burden on low and moderate-income households so no more than 30% of their household income is dedicated to housing-related expenses.

g) Economic development

Through the CPD Department's Community and Business Development Center, microenterprises will be assisted with technical assistance, training, and financing. These community-based, grassroots businesses will provide wealth creation for the entrepreneurs and services for the community.

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

- 1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.**

The Listing of Proposed Projects includes non-homeless special needs projects and activities that will be implemented to accomplish the priorities and objectives defined. The following is taken from the adopted 2008 Consolidated Plan and Strategy: "The City of Mobile supports and will continue to support the efforts of non-profit and government agencies in their efforts to increase the availability of housing and services to special needs persons, thus reducing the number of persons in need throughout this 5 year planning period. The City will use Federal, State, and local public and private sector resources as efficiently as possible to best serve those persons and areas with the greatest needs."

Since the 2008 Plan was adopted the City has partnered with agencies such as Volunteers of America and the Independent Living Center to address the special needs population with funding support under the CDBG and HOME programs. Also through its HOME program, CPD staff has also done outreach with organizations such as AIDS Alabama, to explore potential partnerships for special needs housing.

Housing Opportunities for People with AIDS

Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.

- 1. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.**
- 2. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.**
- 3. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.**
- 4. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.**
- 5. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.**
- 6. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.**
- 7. Please describe the expected trends facing the community in meeting the**

needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.

- 8. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.**

At this time, the City of Mobile does not receive HOPWA funding.

Specific HOPWA Objectives

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

At this time, the City of Mobile does not receive HOPWA funding.

Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.

N/A

ADDITIONAL INFORMATION FOR THE CITY OF MOBILE'S 2012 ACTION PLAN

LEAD-BASED PAINT NARRATIVE (Page 15)

In the homeowner rehabilitation programs administered by the Community Planning and Development (CPD) Department, we presume the presence of lead as nearly all of the homes we are working on were built prior to 1978. When applicant receives project application, CPD staff also provides them EPA pamphlet entitled "Protect Your Family From Lead in Your Home." This is also provided to potential home buyers. They have to acknowledge receiving the pamphlet by signing acknowledgement form.

After work write up is complete, CPD staff will analyze whether any painted surfaces will be disturbed during the course of rehab. If it is determined that the proposed work will disturb painted surfaces, the Housing Rehab Coordinator will contact SafeState Environmental Programs Division of the University of Alabama, Tuscaloosa to come and do a lead test and assessment on the property. The CPD Department has entered into a contract with SafeState Environmental Programs Division of the University of Alabama, Tuscaloosa to perform these services. When the work is complete, they will come back to do a clearance test.

The CPD Department also maintains a list of pre-approved contractors for small residential rehabilitation (see attached list). As part of the contractor's application, we ask if they have completed a Lead Safe Work Certification program, and if they have, they are required to present the certificate received upon course completion. This certification is noted by their name on the list of pre-approved contractors which is given to homeowners.

If the rehab work to be performed is classified as "emergency" work, we will not complete the test, but rather immediately complete the emergency work, utilizing a lead-based paint certified contractor.



**CITY OF MOBILE
PRE-APPROVED CONTRACTORS FOR SMALL RESIDENTIAL
REHABILITATION**

LIST AS OF MAY 4, 2012

This list is provided for informational purposes only and does not constitute an endorsement or promotion of specific contractors, their services, or products. As of the date of this list, these contractors hold a current bond and business license with the City of Mobile and can be issued a building permit.

All Pro Painting and Improvement*(LSWC)

Contact: George Baird
178 April Street
Mobile, AL 36608
(251) 391-1409 / (251) 767-0205

American Homes Contracting (HBL, LSWC)

Contact: William Griffin
2021 Airport Blvd., Suite B
Mobile, AL 36606
(251) 786-0445 / (251) 243-5738

Wayne Askew Contracting, Inc.

Contact: Wayne Askew
7740 Squire Court
Mobile, AL 36695
(251) 454-1867

Barry Wiseman Contracting (HBL, LSWC)

Contact: Barry Wiseman
958 Highpoint Dr. West
Mobile, AL 36693
(251) 423-3854

Berls Construction, Inc.

Contact: Fred Berls
1409 Regency Oaks Drive
Mobile, AL 36609
(251) 343-9905 / (251) 751-8944

Ben Stewart Builders (HBL, LSWC)

Contact: Ben Stewart
440 Azalea Road
Mobile, AL 36609
(251) 776-2888

Custom Remodelers & Home Builders

Contact: Tony Dickey
103 Appomatox Drive
Daphne, AL 36526
(251) 689-9527
tmdmobile@bellsouth.net

Diversified Roofing Service, Inc.

Contact: Bryan Weeks
413 Saraland Blvd N
Saraland, AL 36571
(251) 675-1140 / (251) 402-6493

DW Gwatkin Construction Co. * (LSWC)

Contact: David Gwatkin
P.O. Box 6471
Mobile, AL 36660
(251) 973-9212 / (251) 591-4625

Fred South Construction (HBL, LSWC)

Contact: Fred South
1112 Dauphin St.
Mobile, AL 36604
(251) 533-2635

Gary Powers Development, Inc.

Contact: Gary C. Powers
24257 County Rd 55
Loxley, AL 36551
(251) 947-3915 / (251) 979-5467

Kiker Corporation

Contact: R. Bruce McCrory
3150 Lees Lane
Mobile, AL 36693
(251) 661-1971

Maclay Construction (HBL)

Contact: Charlie Maclay
7251 Grelot Road
Mobile, AL 36685
(251) 633-9323 / (251) 401-3717

Marion's Painting Contractor's

Contact: Marion Timmons
1931 Wolf Ridge Road
Mobile, AL 36618
(251) 605-8976
mctimmons1@comcast.net

Rayshe Builders & Repairs (HBL, LSWC)

Contact: Rayford Campbell
5321 Oak Bend Ct.
Mobile, AL 36609
(251) 366-7006

TE Montgomery Construction (HBL)

Contact: Robby Montgomery
P.O. Box 190035
Mobile, AL 36619
(251) 443-7004 / (251) 402-8512

Habitat For Humanity

Contact: Josh Shedeck
P.O. Box 16422
Mobile, AL 36616
(251) 454-0712

Ladas Construction Co., LLC

Contact: Mr. Coumanis
426 S Craft Hwy
Chickasaw, AL 36611
(251) 456-4516

Manuel Construction Co.

Contact: John Manuel
502 Bay Shore Avenue
Mobile, AL 36607
(251) 421-7228

Chris Pringle Inc.

Contact: Chris Pringle
4 Princess Anne Rd.
Mobile, AL 36608
(251) 604-3357
chrispringle@southerntimberlands.com

TCM Remodelers, Inc.

Contact: John D. Thomas
1061 Elmira Street
Mobile, AL 36604
(251) 433-9000 / (251) 209-4281

* The City of Mobile can issue permits to these contractors only for work UP TO \$10,000 (total project cost).

HBL (Homebuilder's License), LSWC (Lead Safe Work Certificate)

AFFIRMATIVE MARKETING PROCEDURES AND REQUIREMENTS

When five or more units of housing are developed as part of a project with the use of CDBG or HOME funds, the property owner/CHDO will be required to affirmatively market the property. Affirmative marketing includes taking actions to provide information and otherwise attract eligible persons in the housing market area to the available housing without regard to race, color, national origin, sex, religion, familial status or disability.

Affirmative marketing requirements include:

1. The City of Mobile's Community Planning and Development Department (CPD) will inform the public, owners and potential tenants about Federal Fair Housing laws and Affirmative Policies and the participating jurisdiction's affirmative marketing procedures and requirements. This can be accomplished by one or more of the following:

- Posting a copy of the City of Mobile's affirmative marketing procedures and requirements in the CPD lobby.
- Displacing Fair Housing posters in the CPD lobby.
- Providing property owners, HOME-assisted agencies/CHDOs and prospective tenants or home purchasers with a copy of the City of Mobile's affirmative marketing procedures and requirements and federal fair Housing Laws.
- Notifying prospective tenants or purchasers that they may learn more about Federal fair Housing laws and associated programs by contacting the Center for Fair Housing at 600 Bel Air Boulevard, Suite 112, Mobile, AL 36606, or by phone at (251) 479-1532.
- Including the Equal Housing Opportunity logo or slogan in press releases, advertisements, etc.

2. Under the HOME Program, Owners/CHDOs/HOME-assisted Agencies must adhere to the following requirements and procedures

- Agencies/CHDOs/owners will be provided/or will obtain a list of potential tenants from the appropriate Housing Authority Section 8 waiting list, which was formulated under the standards of fair housing, equal opportunity and non-discrimination. Agencies/CHDOS/owners must utilize this list whenever marketing their units.
- Agencies/CHDOs/owners must advertise through the various media (newspaper, radio or television) to inform potential renters of the availability of units:
- Through written and verbal communication, Agencies/CHDOs/owners must contact and inform human and social service agencies that assist lower income families and individuals about housing availability;
- Agencies/CHDOs/owners must advertise utilizing equal opportunity and non-discrimination standards (logo);
- Agencies/CHDOs/owners must, to the extent feasible without holding units off the market, make information about upcoming vacancies known to the general public; and
- Agencies/CHDOs/owners selected for HOME program participation must execute an Agreement assuring compliance with program requirements which will be applicable for the duration of the affordability time period.

- Agencies/CHDOs/owners shall notify prospective tenants or purchasers that they may learn more about Federal Fair Housing laws and associated programs by contacting the Fair Housing Center at 600 Bel Air Boulevard, Suite 112, Mobile, AL 36606, or by phone at (251) 479-1532.
- Displaying Fair Housing posters in their business office lobby and/or in their rental property.

3. Owners will be required to inform and solicit applications from persons in the housing market area who are not likely to apply for housing without special outreach (members of minority groups, the elderly, and persons with disabilities), the City will designate specific tasks that that property owners, in conjunction with the HOME-assisted agencies/CHDOs must:

- Make the Mobile Housing Board aware of rental and home purchase opportunities that may be available to their customers and prospective customer base.
- Make home buyer education and housing counseling providers aware of home purchase and rental opportunities that may be available to their customer base.
- Make community, religious, education, job training and/or employment organizations aware of home purchase and rental opportunities that may be available to their customer base.
- Provide written and verbal information on the units to groups and organizations serving minorities, the elderly and persons with disabilities.
- Advertise in news media which are widely read by minority persons.
- Make presentations at functions attended by minority persons, and provide written and verbal communication to leaders within the minority communities.
- Begin their special outreach activities immediately upon learning that a vacancy will occur.

4. The City of Mobile's Community Planning and Development (CPD) will maintain records of actions it and impacted property owners take to affirmatively market CDBG and HOME funded projects containing five or more units of housing.

a. **Owners:**

Owners must keep records describing actions to affirmatively market units assisted under the HOME Program, as well as records to assess the results of these actions. Records to be maintained include:

- copies of advertisements;
- copies of information forwarded to organizations and groups serving lower income and minority families and individuals;
- A log of contacts made to inform the community and potential residents of housing opportunities.
- The racial, ethnic and gender characteristics of potential homeowners, tenants, and rental property owners for the 90 days following acquisition/rehabilitation, as required by 24 CFR Part 92.351; and
- information from tenants on how they were informed that units were available.

b. HOME-assisted agencies/**CHDOs:**

Each Agency/CHDOs must maintain records of its marketing efforts and those of project owners with whom it works:

- samples of project owner advertisements and copies of all advertisements;
- samples of project owner information, and copies of Agency/CHDO information, forwarded to organizations and groups serving lower income and minority families and individuals;
- A copy of Agency/CHDO and project owner contact logs made to inform the community and potential residents of housing opportunities; and
- The racial, ethnic and gender characteristics of potential homeowners, tenants, and rental property owners for the 90 days following acquisition/rehabilitation, as required by 24 CFR 92.351.

c. The City will maintain/monitor records from each Agency/CHDO/owner. All project records shall be made available to the City upon request.

5. The City's Community Planning and Development Department (CPD) will annually assess the results of its affirmative marketing procedures and requirements for CDBG and HOME funded projects containing five or more units of housing. This assessment will occur as part of the preparation of the Consolidated Annual Performance and Evaluation Report (CAPER), and will seek to determine the effectiveness of actions taken and require corrective action and modification to the affirmative marketing procedures and requirements if necessary. The effectiveness of the City's affirmative marketing efforts will be assessed as follows:

- a. Examination of records required of agencies/CHDOs/owners on actions they have taken to affirmatively market the available units and compare these records to the program's requirements. If the City finds that the required actions have been carried out as specified, it will judge the owners to have made good faith efforts to carry out the program requirements;
- b. The City will assess whether or not tenants from a variety of income levels and minority groups have applied for occupancy and have become tenants in the HOME assisted units. If it finds that this variety is present, or substantial outreach efforts were made and no such diversity is present, it will judge the owner to be in compliance with program requirements. However, if the City finds that a diversity of tenants is not present and the required efforts are insufficient, it will review the Agency's/CHDO's/owner's procedures and determine what changes would make the affirmative marketing more effective.

The City will ask agencies/CHDOs/owners, and other pertinent organizations such as the Fair Housing Center for their analysis and suggestions concerning its affirmative marketing practices.

The City will take corrective actions if it finds that any potential homeowners, tenants, and owners of rental properties fail to carry out the program requirements, or fail to maintain the records on applicants and tenants in

accordance with Section 92.351. If, after discussions with the agencies/CHDOs/owner on ways to improve affirmative marketing requirements, the City will consider disqualifying them from future participation in the HOME Program.

MINORITY/WOMEN OWNED BUSINESS ENTERPRISE OUTREACH

The City of Mobile's Community Planning and Development (CPD) established and oversees an outreach program aimed at increasing the participation of minority and women-owned business enterprises (M/WBE) in the City and related contracts. The City's Community Planning and Development Department and its partners also take all necessary affirmative steps to assure that M/WBE firms are used to provide goods and services when possible.

This includes complying with 24 CFR Part 85.36 (e) Contracting with small and minority firms, women's business enterprises as described below:

- Placing qualified small and M/WBE contractors on the solicitation and Pre-Approved lists.
- Marketing contracts and business opportunities under the HOME and CDBG Programs to small and M/WBEs.
- Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and M/WBEs.
- Using the services and assistance of the Small Business Administration, Mobile Area Chamber of Commerce, Mobile Growth Alliance Taskforce, Minority Business Development Agency Business Center (MBDA), and Women's Business Center.
- Requiring prime contractors, if subcontractors are to be let, to take affirmative steps listed above.
- Holding one or more meetings with small, minority and women-owned businesses to provide information and technical assistance regarding participation in the HOME and CDBG Programs.
- The City and its partners maintain records with statistical data on the use and participation of minority and women-owned businesses under the HOME and Programs. These records are centralized and maintained in the CPD Department.
- HOME developers and CDBG subrecipients will be required to comply with the City's M/WBE requirements.

Toward this end, the Minority and Women-Owned Business Enterprise (M/WBE) program is designed to assist minority and women-owned businesses with obtaining City contracts and become competitive. The program seeks to provide information and training through partnership with other local small, minority and women-owned business development agencies that helps in the growth and development of M/WBE firms. The ultimate goal of this program is to increase the number and success rate of M/WBEs; increase contracting and procurement dollars spent with M/WBEs; and increase the capacity of M/WBEs to compete for wide range of projects.

The City's CPD is considering a Disparity Study on economic and contracting conditions for minority and women-owned firms. The conclusions and recommendations would be used to

formulate additional strategies and policies designed to strengthen and expand contracting opportunities for M/WBE forms.

The City has implemented a small and micro loan program focused on providing financing for small, minority and women-owned businesses that usually have difficulties getting regular conventional business loans from the banks. This program assists qualified small, M/WBEs in obtaining necessary financing to start or expand their businesses, as well as execute contracts.

The Community Planning and Development Department has initiated strategies to ensure that the benefits of the City's HOME and CDBG Programs were accessible to families, individuals, M/WBEs who might not otherwise be aware of its activities. The primary strategy used by CPD staff is to make presentations to neighborhood groups in low to moderate income areas; in addition to advertising all meetings in the local media, posting notices on the City website, sending direct mailings to property owners and potential recipient families, faith-based organizations and subrecipients, and making announcements at program partners' meetings. Staff also participates in public hearings and community meetings frequented by M/WBEs and business development agencies to further inform them about current housing programs and contract opportunities for M/WBEs.

Throughout the year, CPD receives applications from potential small, M/WBE contractors, reviews and approves qualified contractors for inclusion on the Pre-Approved List of Contractors for Housing Rehabilitation and Projects.