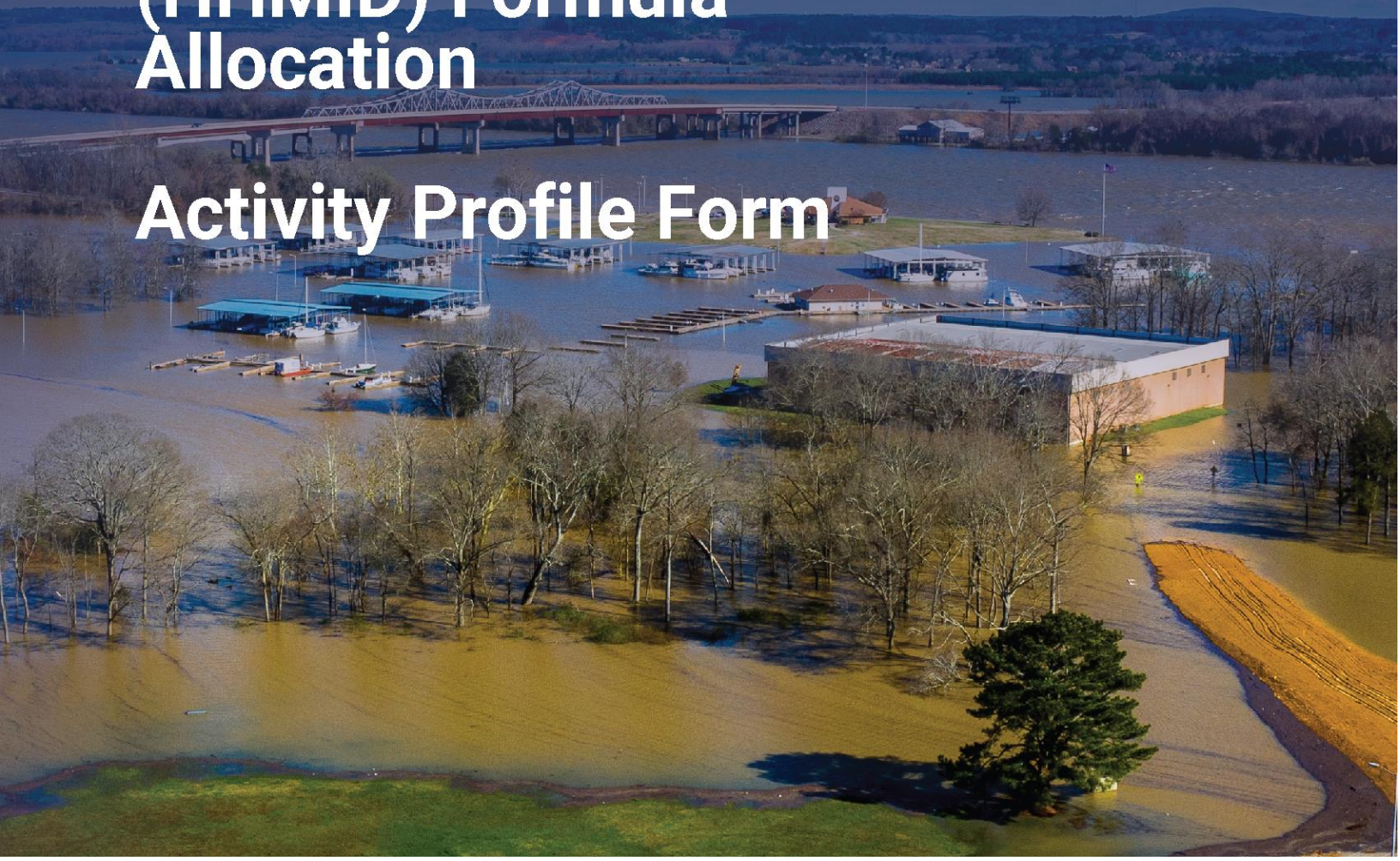


# STATE OF *Alabama*

## CDBG-DR Hardest Hit Most Impacted and Distressed (HHMID) Formula Allocation

### Activity Profile Form



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## Instructions

Please complete all the applicable fields below. Each field will include the necessary instructions to adequately complete the field. If a question requires supplemental instructions or clarifications, those will be found in the Appendices. Once submitted, this Activity Profile Form (and applicable attachments) will be reviewed for completeness and eligibility.

Subrecipients are encouraged to contact Tammy Perdew ([tammy.perdew@adeca.alabama.gov](mailto:tammy.perdew@adeca.alabama.gov)) for technical assistance if any clarifications are needed to complete this Activity Profile Form.

<b>Proposed Project/Program Name:</b>	<b>Homeownership Assistance Program</b>
<b>Proposed Project/Program Amount:</b>	<b>\$19,169,010</b>

## 1. Activity Profile Subrecipient Information

<b>1a. Subrecipient Information</b>					
Subrecipient Name:		Baldwin County Commission			
Subrecipient Address:		312 Courthouse Square, Suite 11			
City/Zip:		Bay Minette/ 36507		County:	Baldwin
Phone:	251-937-0281	E-Mail:	<a href="mailto:James.Ball@baldwincountyal.gov">James.Ball@baldwincountyal.gov</a>		
Subrecipient EIN #	63-6001408	SAM ID#:	MMDHCQ2E82J5	STAARS VSS Acct#	VC000137679
Chief Elected Officer:		James E. (Jeb) Ball			
Alternate Contact (if different than above):		Brian Underwood			
Phone:	251-937-0281	E-Mail:	<a href="mailto:Brian.Underwood@baldwincountyal.gov">Brian.Underwood@baldwincountyal.gov</a>		
<b>1b. Collaborator (if applicable)</b> <i>Is the subrecipient collaborating with another entity (i.e., county or municipality) to implement the proposed project?</i>			<input checked="" type="checkbox"/> <b>Yes-</b> Complete the section below <input type="checkbox"/> <b>No-</b> Proceed to section 1c		
Collaborator Entity Name:		Family Promise of Baldwin County			
Collaborator Address:		20511 County Road 36			
City/Zip:		Summerdale/36580		County:	Baldwin
Phone:	251-947-5641	E-Mail:	Beth@familypromisebc.org		
EIN #:	20-5453410	SAM ID#:		STAARS VSS Acct#	
Chief Elected Officer:		Beth Biggs			
Alternate Contact (if different than above):					
Phone:		E-Mail:			



☐ Activity profiles involving multiple jurisdictions **must** include a draft of an Interlocal Agreement, Memorandum of Understanding, or similar agreement that defines each entity's roles and responsibilities regarding the project, including for such items as ongoing maintenance, transfer of property that needs to be acquired, etc.

### 1c. Supplemental Information

Identify the name, telephone, and district # of the State Senator(s) representing your jurisdiction.	State Senator Greg Albritton Senate District No. 22, 251-937-0240 State Senator Chris Elliott – Senate District No. 32, 251-990-4615 State Senator Vivian Davis Figures – Senate District 33, 334-261-0871
Identify the name, telephone, and district # of the State Representative(s) representing your jurisdiction.	State Representative Donna Givens – House District No. 64, 251-990-4615 State Representative Alan Baker – House District No. 66, 251-867-0244 State Representative Jennifer Fidler – House District No. 94, 251-990-4615 State Representative Frances Holk-Jones – House District No. 95, 251-990-4615 State Representative Matt Simpson – House District No. 96, 251-990-4615 State Representative Shane Stringer – House District No. 102, 334-261-0594 State Representative Brett Easterbrook House District No. 65, 334-261-0402
Identify the U.S. Congressman representing your jurisdiction and congressional district number.	Honorable Barry Moore, Alabama's 1 <sup>st</sup> Congressional District

## 2. Project Aspects

This section will be used by ADECA to determine the basic eligibility of the proposed project/program and how well it aligns with program and grant requirements, goals, and objectives. Subrecipients should provide enough details to allow ADECA to properly evaluate the responses.

### 2a. Housing Project Summary

Provide an overview of the proposed housing project for which funding is being requested. Provide a narrative that describes the following about your project:

- A detailed project scope
- The project's goals
- How it aligns with LRP recovery strategies
- A description of the existing conditions that are to be addressed/alleviated

- The proposed solutions to address/alleviate those conditions
- And any other information that is needed to clearly present the project to ADECA.

***Prior to completing this section, subrecipients are advised to review the remaining questions in this section of the Activity Profile Form to avoid redundancy when answering the different fields.***

**Select the project's housing type:**

- ☐ Affordable Rental Housing      ☒ Homebuyer Assistance  
☐ Homeowner Buyouts              ☐ Multifamily Rental Housing (5 or more units)

As part of initial recovery activity, Baldwin County engaged in local planning, identifying acute needs demonstrated by federal, state, and local data, and community engagement. Planning outcomes clearly described impacts to the housing stock, and in response the County has designed a Homeowner Assistance Program (HAP) to meet the housing need. HAP will provide direct assistance to up to 200 eligible households to support homeownership opportunities in an effort to make homeownership more attainable in the current housing market.

The program is designed to support households affected by the storms associated with DR-4563 and DR-4573. Eligible participants must demonstrate an income of 80 percent AMI or below and at least one of the following rental requirements:

- Renter/owner households that were residents of Baldwin County in 2020, were directly or indirectly impacted by the disaster and are approved to purchase a home;
- Households that moved out of Baldwin County after the storms but are now interested in relocating back to the county and are approved to purchase a home;
- Households that were in the process of purchasing a home damaged by the storms in Baldwin County at the time of the disaster.

The program will satisfy CDBG-DR LMI benefit requirement, where at least 70 percent of beneficiaries served are at or below 80 percent AMI. Applicants at or below 80 percent AMI will be prioritized and qualify under the National Objective Low to Moderate Income Housing (LMI-H). Baldwin County will assess the level of interest in the program after launch and consider extending HAP to eligible participants with an income up to 120 percent AMI, in compliance with the alternative requirements in the Federal Register allocation notices (87 FR 6364 and 87 FR 31636).

Existing local housing conditions include a combination of widespread cost-burdened households, hurricane damages, and development trends of increased single-family new builds and a reduction of multi-family rental units. Such experiences are documented in ADECA's Action Plan and Baldwin County's approved Local Recovery Plan (LRP). Prior to and since the disasters, many households find themselves stretching their income to meet housing costs. To address housing cost and quality, and align with development realities, the County determined HAP would meet local needs and described the program and implementation mechanics in its LRP.

HAP will place an emphasis on providing opportunities for home purchases outside of high-risk areas, as designated by Baldwin County and its municipalities, encouraging community diversity and equity among residents and neighborhoods. HAP will offer support to encourage long-term homeownership, ensure quality housing is attained, and responsible lending has occurred. In addition to direct assistance, eligible program activities include case management, homebuyer counseling, home inspections, lender engagement and training, and administrative oversight. Eligible program costs include down payment assistance, interest rate buy-down, reasonable closing costs (including but not

limited to legal, closing fee, title search, conveyance documents, notary fees, surveys, recording fees, lender fees, appraisal, and inspections), legal services needed to help eligible residents throughout the homebuyer process, inspection services, and housing counseling costs. Downpayment assistance will be prioritized amongst all eligible program costs in compliance with CDBG requirements.

## 2b. For New Affordable Multifamily Rental Housing Projects

The Unmet Needs Assessment demonstrated a higher need for affordable rental housing, so the additional points will be awarded to the projects that propose new affordable rental housing units.

***Does this project propose new affordable rental housing?***

☐ **Yes**, the project is a new affordable rental housing project.

☒ **No**, the project is not a new rental affordable housing project (*Enter N/A below and skip to question 3*)

Creating affordable housing opportunities is the key goal of CDBG-DR funded housing project due to the identified need in the disaster affected areas, according to the Unmet Needs Assessment (which can be found in the Public Action Plan on ADECA's website). If your project is a new rental affordable housing project, **provide a projection of how many rental affordable housing units your project will create and how many beneficiaries the proposed project is intended to benefit.**

N/A

## 2c. Infrastructure/Economic Development Project Summary

Provide an overview of the proposed infrastructure, economic development, or mitigation project/program for which funding is being requested. Provide a narrative that describes the following about your project/program:

- A detailed project scope
- The project's goals
- How it aligns with LRP recovery strategies
- A description of the existing conditions that are to be addressed/alleviated
- The proposed solutions to address/alleviate those conditions
- And any other information that is needed to clearly present the project to ADECA.

***Prior to completing this field, subrecipients are advised to review the remaining questions in this section of the form to avoid redundancy when answering the different fields.***

Is this project proposing a: ☐ Public Facility Improvement ☐ Infrastructure Improvement  
☐ Commercial Facility Improvement ☐ Other (describe below)

N/A

## 2d. For Economic Development Projects

CDBG-DR funding can be used to fund economic development activities in the following ways:

- Acquiring, constructing, reconstructing, rehabilitating, or installing commercial or industrial buildings, structures, and other real property equipment and improvements by public and non-profit entities;
- Directly assisting private, for-profit businesses;
- Economic development carried out by a community-based development organization;
- Providing technical assistance and training directly to businesses;
- Fostering the development, support, and expansion of microenterprise businesses (five or fewer employees, one or more of whom owns the business);
- Rehabilitating commercial structures up to code or improving their facades;
- Public works projects such as off-site water, sewer, roads, drainage, and other types of public facilities or improvements that support economic development endeavors.

Does the proposed project/program meet one of the activity examples above?

**See Appendix A for additional guidance and regulatory references for Economic Development activities.**

☐ **Yes**, the project/program is an Economic Development project. *(Make sure the response for question 2a above provides details about the economic development aspects of the project.)*

☒ **No**, the project/program is not like the examples above and is not an Economic Development project *(Enter N/A below)*

Creating economic opportunities and jobs are among the key goals of CDBG- DR funded economic development projects. If the project/program is an economic development project, provide a projection of how many new, permanent jobs the project/program will create, and the estimated annual payroll amounts for each.

Format your response in the following manner: **Quantity / Position Title / Hours per Week / Annual Pay**

**See Appendix A for clarification on how to count job creation.**

N/A

## 2e. Recovery or Mitigation Project (or Both?)

The project/program must either be a disaster recovery project, a mitigation project, or meet the definition of both recovery and mitigation:

- 1) A **recovery** activity is one that demonstrates a clear, justifiable direct or indirect tie back to the disaster, and addresses a disaster recovery need

This project:

<p>described in the impact and unmet needs assessment in the ADECA Public Action Plan.</p> <p>2) Unlike disaster recovery activities, <b>mitigation</b> activities do not require a direct tie back to the disaster. Rather, a mitigation project will be required to demonstrate how it will increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters. Mitigation projects must also demonstrate how they will address current and future risks as identified in ADECA’s mitigation needs assessment.</p> <p>Depending on the type of project/program it is, provide a narrative below that addresses the applicable criteria above. In the event the project exhibits properties of both recovery and mitigation projects, provide an explanation that satisfies both.</p> <p>For mitigation activities specifically, also indicate which of the top six hazards (identified on pages 79-81 in the ADECA Public Action Plan) that pose the greatest threat to lives and property in the disaster-impacted counties will be addressed through the proposed activity, as well as a description of how the project will increase resilience to this type of hazard(s).</p> <p><b><i>Please see Appendix B for instructions on where to find information from the Unmet Needs Assessment and Mitigation Needs Assessment to help inform this response.</i></b></p>	<p><input checked="" type="checkbox"/> Is a Recovery Project</p> <p><input type="checkbox"/> Is a Mitigation Project</p> <p><input type="checkbox"/> Meets definition of both Recovery and Mitigation</p>
<p>HAP is a direct response to the needs identified by ADECA in its Action Plan for Disaster Recovery for Hurricanes Sally and Zeta. The plan provides a comprehensive description of the housing landscape across the state and expresses both pre- and post-storm experiences.</p> <p>Pre-storm realities are depicted in ADECA’s review of its FY20-24 Five-Year Consolidated Plan, which “found that a significant number of households across the entire State [were] in need of some type of housing assistance”, especially those with the lowest incomes (ELI) (State of Alabama Action Plan for Disaster Recovery Hurricanes Sally and Zeta, p. 12). Needs were acutely identified as housing cost burden, with renters and owners displaying similar distress, representing 60 percent and 40 percent of households, respectively (State of Alabama Action Plan for Disaster Recovery Hurricanes Sally and Zeta, p. 12). Rental households, especially ELI, were impacted by the availability and affordability of rental homes. The Plan pointed to 2020 5-Year ACS Public Use Microdata Sample (PUMS), to identify a shortage of 76,023 rental homes. The Plan further iterates the magnitude of cost burden households, describing the experience of owner-occupied residents. While the state has a very respectable homeownership rate with over two-thirds of the state’s stock owner-occupied “homeownership can still be too costly for many households to achieve” (State of Alabama Action Plan for Disaster Recovery Hurricanes Sally and Zeta, p. 12).</p> <p>Existing housing affordability concerns have compounded with disaster impacts to further subject households to fiscal constraints. FEMA IA saw applications across housing groups, including renters and homeowners. The breakdown between the two were nearly evenly split “with owners comprising fifty-five percent (55%) and renters comprising forty-five percent (45%) of all applications” State of Alabama Action Plan for Disaster Recovery Hurricanes Sally and Zeta, p. 22). Both groups experienced</p>	



the same rate in application approval, demonstrated by “a nine percent (9%) gap between units found to have damage and received assistance” State of Alabama Action Plan for Disaster Recovery Hurricanes Sally and Zeta, p. 22). In total, FEMA IA data found a total of \$114,808,557 in verified loss across the state. While Mobile County had the highest number of applications for housing inspections, Baldwin County followed with 21,127 applications submitted and “the second highest FEMA Verified Loss, totaling \$42,285,296.”

The breadth of housing needs reported by ADECA was received by the County and used as primary consideration when depicting a potential program to serve the community. With the understanding that housing costs negatively impact residents across housing experiences, the County determined homebuyer support would prove the most effective method of maximizing impact by increasing homeownership, directly reducing cost burden households among homeowners, and reducing the number of renters and pressure in the rental market.

In addition to the narrative above, subrecipients **must attach the following** to the form:

**For Projects/Program that Meet a Recovery Need:**

☒ Documentation of loss from the hurricane(s), including damage or rebuilding estimates, insurance loss reports, images, or similar information that documents damage caused by the disaster. Sufficient documentation for non-physical disaster-related impacts must clearly show how the activity addresses the disaster's impact. For example, documentation for economic revitalization activities may include data about job loss or business closings after the disaster, or data showing how pre-disaster economic stressors were aggravated by the disaster.

☐ N/A- The project meets the definition of a mitigation project and is explained above.

## 2f. Alignment with the Local Recovery Plan and other Plans and Efforts

A prerequisite for receiving implementation funding is the completion of a local recovery plan via ADECA’s Local Recovery Planning Program, which will detail recovery and mitigation strategies and priorities of each eligible subrecipient.

Describe how your project/program aligns with a recovery or mitigation strategy(ies) identified in your entity’s ADECA-accepted **Local Recovery Plan**. In your narrative below, refer to the specific page(s) in the Plan that describes the strategy this project will address, in addition to explaining what priority level the proposed project is (i.e., the project addresses the highest stated priority or need from the Plan, a secondary priority or need, and so on).

The Baldwin County Local Recovery Plan for DR-4563 and DR-4573 discusses unmet housing needs, using data produced by FEMA, SBA, and private insurance companies, and further describes the County’s approach to addressing housing recovery through the implementation of a Homeownership Assistance Program (HAP) (Baldwin County Local Recovery Plan for DR-4563 and DR-4573, p. 21 and 98). FEMA data demonstrated 2,322 IA applicants with flood damage, of which 69 percent were owners and 31 percent renters. Cumulatively, the two groups experienced a total damage of \$24.9 million of disaster-related damages. Most damages were the result of flood impacts to “floors, walls, access roads and bridges, electrical, plumbing, [and] HVAC”. The property damage experienced by

households, especially homeowners, demonstrates clear housing recovery needs for those who were residents at the time of the disaster.

The LRP further describes the County's long-term housing trends, particularly in terms of development and housing type. It was noted that "between 2017 and 2020, the total housing stock in Baldwin County increased overall by 6,724 units, or 6.1 percent", much of which consisted of single-family homes (Baldwin County Local Recovery Plan for DR-4563 and DR-4573, P. 22). By 2022, the County's single-family housing stock reflected 64.5 percent of total inventory. Simultaneously, a reduction in the number of large apartment buildings was observed. In fact, the County has seen a reduction of 240 large apartment building since 2017. Perhaps relatedly, increased rental prices have impacted the community (Baldwin County Local Recovery Plan for DR-4563 and DR-4573, pg. 22). The LRP describes consistent rent increases year over year, with the median rent price increasing from \$904 in 2017 to \$1,032 in 2020. The County's housing issues are acutely demonstrated by increased number of single-family homes, a reduction in multifamily properties, and increased rents among renters.

The combination of disaster induced property damage among homeowners, increased number of single-family detached homes and pressure on the rental market, informed the County's decision making when identifying HAP as a key programming mechanism to address local needs. As depicted in the LRP, the HAP "is designed to assist low-to-moderate (LMI) households with the purchase of affordable housing using HUD CDBG-DR funds. The program assistance is intended to fill the gap between what an LMI applicant can afford for a first mortgage and the purchase price of a single-family home" (Baldwin County Local Recovery Plan for DR-4563 and DR-4573, p. 97).

Other than the **Local Recovery Plan**, does this project/program align with other planned federal, state, local or tribal development efforts or mitigation plans? If yes, please identify the specific plan(s) or effort this project/program aligns with and provide a summary of how the project/program addresses it.

N/A

- ☐ If your project/program aligns with other development efforts and plans as identified above, you **must attach** the pertinent document (or excerpt from the document if it is too large) or other evidence that supports your claim.
- ☒ N/A- The proposed project/program does not align with any known development efforts or plans outside of the Local Recovery Plan.

## 2g. Incorporation of Design Strategies and Elements

If your project/program is an infrastructure activity, describe how your project/program incorporates the following design aspects:

- How will mitigation measures and strategies to reduce natural hazard risks, including climate-related risks, be incorporated into project/program design? (*Note this is a grant requirement for all infrastructure activities, not just those that meet HUD's definition of a mitigation activity.*)
- How will federal elevation and accessibility standards be incorporated into the design of building projects/programs? (Note in the absence of locally adopted and enforced building codes, the requirements of the Alabama State Building Code will apply.)
- How will adaptable and reliable technologies be employed to prevent premature obsolescence?

<ul style="list-style-type: none"> <li>What, if any, are the expected long-term risks to the project/program the subrecipient or collaborator may encounter?</li> </ul>
<p><b>See Appendix C for clarifications on infrastructure activities, elevation standards, and accessibility standards.</b> If your proposed project/program is not an infrastructure activity, enter N/A below.</p>
N/A
<p>Will the project/program address the construction or rehabilitation of a disaster-related system or other community-based mitigation system? If yes, please explain below. If not, enter N/A.</p>
<p><b>See Appendix C for clarification on disaster-related systems and community-based mitigation systems.</b></p>
N/A

2h. Acquisition and Relocation Considerations	
How many parcels of land or pieces of property will be needed for the implementation of this project/program, if any?	0
What is the site control status of the proposed project/program site(s)?	<input type="checkbox"/> Site(s) are already owned/controlled by the subrecipient <input type="checkbox"/> Site(s) are not owned/controlled by the subrecipient, but are currently under contract <input type="checkbox"/> Site(s) will need to complete an acquisition process as part of the project scope
Will this project/program require, or result in, the displacement and/or relocation of residential or commercial occupants?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input type="checkbox"/> If you indicated that you already have site control or have the project/program site under contract, you <b>must attach</b> the pertinent document (or excerpt from the document if it is too large) or other evidence that supports your claim.	

2i. Studies or Analyses to Support the Activity	
Is the project/program supported by a feasibility study, market analysis, relevant technical or economic study, or similar third-party analysis/study/document?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If so, please provide below a summary of each and explain how the proposed project/program is supported.	
<p>As part of the LRP process, the County conducted a market assessment to confirm both program validity within the local market and the appropriateness of potential award amounts to ensure the program's effectiveness. The assessment determined that using a maximum home price of \$307,000, though approximately 16 percent below Baldwin County's median sale price, still yielded a strong inventory of decent, safe, and sanitary homes available for purchase. Analysis showed that a household earning \$71,300 per year could reasonably afford a mortgage of about \$245,000, resulting in a monthly payment near \$1,700, which remains under the generally accepted threshold of 30 percent monthly income for housing expenses. This creates a \$62,000 affordability gap between what a low- to moderate-income (LMI) household can finance on its own and the target home price.</p>	

With CDBG-DR support, this gap can be covered through downpayment and closing cost assistance. For example, a 20 percent downpayment on a \$307,000 home totals \$61,400, and estimated closing costs of 6 percent add \$14,700, bringing the total required assistance to \$76,100. The assessment also found that as household income decreases, the affordability gap widens; a household earning \$68,000 may require approximately \$89,300 to reach the same purchase price. Based on this range, the assessment recommends setting the CDBG-DR assistance cap at up to \$85,000 to accommodate varying income levels while keeping homes within an affordable price range. Case management providers will support the homebuyer to find other resources to provide the gap funding between the program assistance cap and the total required assistance to close the affordability gap, if necessary. A duplication of benefit assessment will be completed for each award to ensure compliance.

Even with this support, households would still provide 74–75 percent of the total home purchase cost through their own mortgages, leaving the program to cover only about 25–26 percent, which aligns closely with standard downpayment and closing cost needs. By allowing awards of up to \$85,000, the program could assist up to 200 homebuyers, helping to address affordability barriers and expanding access to safe, sustainable housing throughout Baldwin County.

☒ **Attach** the feasibility study, market study, or other relevant technical or economic study referenced above that provides support for the viability of the project/program.

## 2j. Status of Existing Project/Program Development

How would you best categorize the current stage of project development for this proposed activity?

Provide a description of the current status below.

☐ Projects/programs that are ready, or nearly ready to implement. For construction-type projects, this means that the project is “Shovel Ready” and that A&E and project design, environmental review, and all other work needed to begin the project is substantially completed. For projects servicing the public, this can mean that the necessary partnerships are in place to provide said service.

☒ Applicable planning, A&E, plans, designs, and needed reviews have already commenced but have yet to be completed.

☐ Project/program is in early planning stages and still needs substantial A&E, design work, and other applicable planning work.

The County recognizes that successful implementation of HAP will rely on a network of community partnerships to ensure effective and timely service delivery. To meet the program’s needs, the County has identified the importance of collaborating with organizations experienced in case management, housing counseling for homebuyers, real estate services, lending, and public administration support. Although no formal agreements have yet been executed, the County has engaged with entities across all these service areas and has identified partners capable of fulfilling each role and will secure commitments prior to program launch. Following ADECA’s approval of the program, the County will formalize these relationships through agreements, ensuring that all partners are properly aligned to support program operations and achieve successful outcomes for participating households.

## 2k. Actions Already Performed

Have any of the following actions occurred prior to, or are still occurring on, the date of this Activity Profile Form submission?

- Acquisition of the land/properties needed for the project;
- Execution of a contract with a contractor;
- Demolition, land breaking, or moving on the project site;
- Rehabilitation, conversion, repair, or construction work at the project site;
- Transfer, removal, or lease of any property necessary for the project;
- Entering a contract that obligates the applicant to any of the above activities, or;
- Making announcements or commitments that give the impression that the project will definitely go forward in a certain way before the environmental review is completed can influence the outcome of that review.

☐ Yes

☒ No

If so, please describe those actions in detail below, including the date(s) which they occurred, the extent of work performed, current status, etc.

N/A

## 2l. Ongoing Operations and Maintenance

Describe how the ongoing operations and maintenance of this project/program will be managed. Who will be responsible, and how will the ongoing O&M be funded? Will the O&M for this project/program be funded by existing funding streams, or is O&M funding dependent on budgetary adjustments, special approvals, program income, etc.?

☐ O&M to be funded by existing funding streams.

☐ O&M funding not yet identified, requires budget adjustments, special approvals, relies on program income, etc.

Provide an explanation below.

N/A - Homebuyers will be responsible for the operations and maintenance of their properties purchased with support of the HAP. The County will have no obligation to fund ongoing maintenance of facilities.

## 3. National Objective

This section will be used by ADECA to determine whether the proposed activity will meet the national objective of the CDBG-DR program. The Action Plan allows for use of each of the three national objectives – benefit low- to moderate-income persons (LMI), aid in the prevention or elimination of slums or blight (Slum and Blight) and address an Urgent Need (Urgent Need).

Indicate which HUD National Objective you are proposing to satisfy with this activity and provide a narrative to explain how the activity will do so. Please refer to the Action Plan, the ADECA Subrecipient Manual, and 24 CFR 570.208 for information about the national objectives.

**\*\*\*Please Note: The final determination of which national objective will be applied to a project is solely the discretion of ADECA.\*\*\***



<b>Select only <u>ONE</u> option below:</b>	
<b>The project/program will benefit Low to Moderate Income (LMI) Persons:</b>	
<input checked="" type="checkbox"/>	<b>LMI Housing:</b> An activity that will provide or improve permanent residential structures which, upon completion, will be occupied by LMI households.
<input type="checkbox"/>	<b>LMI Area Benefit:</b> An activity, the benefits of which are available to all the residents in a particular area, where at least 51 percent of the residents are low- and moderate-income persons. The area must be primarily residential in character as well.
<input type="checkbox"/>	<b>LMI Limited Clientele:</b> An activity which benefits a limited clientele, at least 51 percent of whom are low- or moderate-income persons, especially those who are generally presumed to be principally low- and moderate-income persons.
<input type="checkbox"/>	<b>LMI Job Creation</b> <i>(for economic development projects only):</i> An activity designed to create permanent jobs where at least 51 percent of the jobs, computed on a full-time equivalent basis, involve the employment of low- and moderate-income persons.
<b>The project/program will aid in prevention or elimination of Slums or Blight (SB):</b>	
<input type="checkbox"/>	<b>SB Area Basis:</b> The project/program will address slums or blight on an <u>area</u> basis where the area meets a definition of a slum, blighted, deteriorated, or deteriorating area under State or local law and also meets additional conditions stated in the HUD regulations.
<input type="checkbox"/>	<b>SB Spot Basis:</b> The project/program will address slums or blight on a <u>spot</u> basis to eliminate specific conditions of blight, physical decay, or environmental contamination that are not located in a slum or blighted area
<b>The project/program will address an Urgent Need (UN):</b>	
<input type="checkbox"/>	<b>Urgent Need:</b> Projects/programs that achieve the UN national objective must be able to link to a stated urgent need in the impact and unmet needs assessment in ADECA's Public Action Plan (see pages 47-50 of the HUD-approved Action Plan on the ADECA public website for details related to the state's unmet housing, infrastructure, and economic revitalization need).
Provide a narrative to expand on how the project/program will achieve the selected national objective.	
For projects/programs proposing the use of Urgent Need, include details on how the activity responds to the urgency, type, scale, and location of the disaster-related impact as described in ADECA's impact and unmet needs assessment.	
To prioritize LMI households, all HAP participants will be required to meet the low- to moderate-income limits, at or below 80 percent of the area median income (AMI). Implementing verification of income procedures will ensure compliance. If the program is not fully subscribed with LMI households, then the County may choose to amend the HAP to allow inclusion of households between 80-120 percent AMI, in compliance with the alternative requirements in the Federal Register allocation notices (87 FR 6364 and 87 FR 31636).	

## 4. Project Location and Service Area

This section will be used to identify the service area of the project/program and the number of persons that will benefit from the project.

4a. Project Location	
Provide street address(es) and zip code(s) for your project/program. For projects/programs that cover a large, or multiple, areas, provide as many streets, intersections, addresses, zip codes, boundaries, GPS coordinates, etc., as needed to define your project's/program's footprint.	
The program will be available to residents County-wide. Zip codes include the following: 36579, 36525, 36578, 36562, 36574, 36511, 36555, 36550, 36577, 36533, 36536, 36547, 36559, 36564, 36532, 36535, 36526, 36507, 36502, 36542, 36527, 36551, 36567, 36561, 36530, 36580, 36549, 36576	
An emphasis is placed on providing opportunities for home purchases outside of high-risk areas, and properties must be outside floodplains.	
Latitude and Longitude coordinates at or near geographical center:	30.745286, -87.737962 is the approximate center of the County
Is the project/program located in, or will it impact the state-recognized tribal reservation areas of either the MOWA Choctaw or Poarch Creek tribes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Resources: <ul style="list-style-type: none"> <li>Alabama Indian Affairs Commission (<a href="https://aiac.alabama.gov/">https://aiac.alabama.gov/</a>)</li> <li>MOWA Choctaw (<a href="https://mowachoctawindians.com/">https://mowachoctawindians.com/</a>)</li> <li>Poarch Creek (<a href="https://pci-nsn.gov/">https://pci-nsn.gov/</a>)</li> </ul>	
Provide any additional comments to clearly describe the project's location and footprint:	
The nature of the project poses no impact on the Poarch Creek tribe. All home sales are subject to the approval of the seller and entity that maintains its jurisdiction.	
<b>Attach the following documents:</b> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> A map printout of your project/program location (using Google Maps or comparable tool) with markings to delineate the project's/program's physical location and footprint.</li> <li><input type="checkbox"/> Pictures of the project/program site(s), existing conditions, and proposed work</li> </ul>	

4b. Project Service Area (for Infrastructure/Economic Development only)
In the space below, explain your project's/program's service area and how you've determined said service area. Provide your justification on why this project/program merits the service area. Describe the geographic area that will benefit from this project/program. Include specific boundaries such as streets, census tracts, or block groups. Be as detailed as possible and explain why this area was chosen as the service area for your project/program.
<b>See Appendix E for service area considerations.</b>
N/A

Per the instructions in <b>Appendix D</b> , use HUD's interactive LMI Area data mapping tool to identify the selected service area for this project/program.	
Indicate the census tract(s) and block group number(s) that make up the project's service area:	
N/A	
<input type="checkbox"/> Per the instructions in <b>Appendix D</b> , obtain map image(s) for the selected service area. <b>Attach</b> the Service Area map image(s) to the application.	
What is the total population of your selected service area? <b>See Appendix E for instructions on calculating this number)</b>	
What is the LMI percentage of your selected service area? <b>See Appendix E for instructions on calculating this number)</b>	percent

## 5. Activity Beneficiaries

This section will be used to inform ADECA of the extent to which the project will help achieve the overall CDBG program goal of benefitting low- and moderate-income persons, while also identifying whether the activity will provide a direct or area-wide benefit to the persons in the service area. The Project Beneficiary Table included on page 50 must be completed as part of this section.

5a. Benefit Type (Housing Activities)	
Confirm that this project/program is a <b>Direct Benefit</b> project/program and will provide assistance to disaster-impacted persons in the HHMID area(s).	
<input checked="" type="checkbox"/>	<b>Direct Benefit:</b> Direct benefit activities are distinguished by their benefit to individual households (e.g., a household who has access to new affordable housing). Examples of activities that provide <b>direct</b> benefits to disaster-impacted persons would be a new construction of multi-family affordable housing, rehabilitation of affordable housing, and relocation assistance.
Provide a projection of the total number of households the activity is expected to benefit:	200

5b. Benefit Type (Infrastructure/Economic Development Activities) N/A	
Indicate the type of benefit – <b>Direct</b> or <b>Area</b> – this project will provide to disaster-impacted persons in the HHMID area(s).	
<input type="checkbox"/>	<b>Direct Benefit:</b> Direct benefit activities are distinguished by their benefit to individual households (e.g., a small business owner awarded a recovery loan). Examples of activities that provide <b>direct</b> benefits to disaster-impacted persons would be an economic revitalization project that awards loans directly to small businesses, or a public works project/program that impacts specific persons directly.
<input type="checkbox"/>	<b>Area Benefit:</b> Area benefit projects do not provide (direct) benefits to specific persons or households and instead benefit most or all persons in the service area, often <i>indirectly</i> . An example of an activity that would provide an <b>area</b> benefit would be a county-wide drainage improvements project that improves drainage for most or all the residents in a town or county,

	or economic assistance to a grocery, pharmacy, or other type of business that provides a service that the entire community uses.
--	--

### 5c. Beneficiary Income Summary

For **Direct Benefit** projects/programs, please complete the table below using a **projection** of the total number of beneficiaries the activity is expected to benefit, as well as the projected income status of those projected beneficiaries (i.e., low-income, moderate-income, and non-LMI). **See Appendix E for instructions on how to determine the applicable income limits for your projections.**

For **Area Benefit** projects/programs, please complete the table below using the income data that was obtained while completing **Question 4b** above.

**For instructions regarding how to calculate the number and percentage of low-, moderate-, and non-LMI project beneficiaries, see Appendix E.**

**Select the appropriate beneficiary type for your project/program (choose one):**

For economic development activities, select either businesses (to be assisted), or jobs (to be created)—whichever one is most appropriate for the goals of your proposed project/program).

Other types of activities, such as housing, infrastructure or public facility improvements, public services, or other non-economic development projects/programs, should select “persons”.

☐ Jobs

☐ Businesses

☒ Persons

Enter Total # of Project Beneficiaries:		
	Amount	percent
Total Number Less than or equal to 50 percent Area Median Income (Low)		
Total Number Between 51 percent and 80 percent Area Median Income (Mod)	200	100
Total Number Over 80 percent Area Median Income (non LMI)		

### 5d. LMI Area Data Sources

**ONLY for projects/programs proposing to meet an LMI Area national objective**, please indicate the data source(s) used to complete the tables above (e.g., U.S. Census data, survey data). Enter N/A otherwise.

N/A

## 6. Activity Schedule

This section will be used to determine whether the proposed project/program can likely be completed by the end of the term of ADECA's agreement with HUD and to assist the subrecipient with keeping the activity on a schedule that will allow for timely completion.

6a. Estimated Project Timeframe	
Indicate the estimated start and completion dates of this project/program (Month/Year):	<b>Program Start: April 2026</b>
	<b>Completed and Operational: September 2028</b>

6b. Projected Milestone Schedule													
Complete the table below with projected completion dates for various project/program milestones <b>(as applicable)</b> . Enter an "X" in the applicable boxes to provide a projection of your project's/program's implementation schedule by quarter, with Q1 representing when the project/program is approved by ADECA.													
For projects/programs that might have unique activities, please enter those activities in the "Other" rows below.													
Activity/Milestone	Q1 1/26	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12	Q13+
Finalize Program Documents	X												
Environmental Review and other ADECA Conditions	X												
Launch Program		X											
Program Implementation		X	X	X	X	X	X	X	X	X			
Monitoring			X	X	X	X	X	X	X	X	X		
Project Closeout											X		
(Other, please enter)													
(Other, please enter)													

## 7. Financial Aspects

This section will be used to determine the extent to which the subrecipient has been able to leverage other funding sources to cover the project's/program's estimated costs, and whether the subrecipient has financially accounted for the entire scope of the project/program.



### 7a. Project/Program Budget

Provide a breakdown of the proposed project/program budget, including the requested allocation amount and any other sources of funding that are needed to implement the project/program. Attach proof of commitment of funds from each non-CDBG-DR funding source that has awarded funding for the project/program. Support may come in the form of an official letter from the awarding entity (e.g., for private, or other funds), an adopted resolution from a local governing body (e.g., for local funds), or another format acceptable to ADECA.

Funding Source	Amount	Funding Committed?	Proof of Funding Attached
The requested allocation amount	\$	n/a	n/a
CDBG-DR funds	\$ 19,169,010	n/a	<input type="checkbox"/>
	\$	<input type="checkbox"/>	<input type="checkbox"/>
	\$	<input type="checkbox"/>	<input type="checkbox"/>
	\$	<input type="checkbox"/>	<input type="checkbox"/>
	\$	<input type="checkbox"/>	<input type="checkbox"/>
<b>TOTAL PROJECT/PROGRAM AMOUNT:</b>	<b>\$ 19,169,010</b>		

☐ Check this box if the allocation is intended to fund the **non-federal match** portion of another federal recovery program (FEMA, Economic Development Administration, etc.)

### 7b. Source and Uses, Cost Estimate

Indicate how the project/program funding is proposed to be divided by use and indicate the source(s) for each of those uses. Please note that program administration costs (PACs) are not eligible LRPP costs; an estimate of PACs does not need to be added to the table below. Please leave fields blank for non-applicable line items.

Applicable Funding Use	\$ Amount	Funding Source(s) (from 7a above) – if more than one source will fund an activity, identify each source and the amount
Downpayment Assistance awards	\$16,708,265	CDBG-DR
Case Management	\$750,000	CDBG-DR
HUD-certified housing counseling	\$240,000	CDBG-DR
Home inspections	\$100,000	CDBG-DR
Other Activity Delivery Costs (e.g., environmental review not performed by engineer, activity specific staff and contracted services, etc.)	\$1,370,745	CDBG-DR
	\$	
	\$	
<b>TOTAL PROJECT/PROGRAM AMOUNT:</b>	<b>\$ 19,169,010</b>	

☐ All proposed projects/programs that involve construction-related work **must attach** a detailed cost estimate prepared by, or reviewed by, an architect, engineer, or another reputable source from the State of Alabama. The cost estimate shall contain the estimated cost of construction, architectural/engineering fees, and related costs, and break down the total project/program cost by activity—and funding source, if other funds will cover a portion of the project's/program's costs.

X Projects/Program's that do not involve construction, like certain public service or economic development activities, do not need an A/E-certified cost estimate, but should still attach a proposed project/program budget that details all pertinent (estimated) costs to plan, design, implement, and close out the project.

**See Appendix F for further instructions and an example of a cost estimate document that must be attached to your Activity Profile Form.**

### 7c. Ineligible Uses of Funds

Do you intend to use the CDBG-DR Formula Allocation to fund any of these purposes?

Rehabilitation and reconstruction of single-family dwellings.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Assisting entities that failed to meet the conditions of obtaining and maintaining flood insurance on prior Federally assisted programs.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Utilization of a property that was purchased using eminent domain for purposes benefiting a private party. (See allowed uses of eminent domain under Section d. Displacement of Persons and Other Entities of the published Action Plan page 97)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Providing compensation to beneficiaries for losses stemming from disaster related impacts.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
Forced mortgage payoff.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Buildings or portions thereof used for the general conduct of government as defined in HCDA Section 102(a)(21)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Expenses required to carry out the regular responsibilities of the unit of general local government	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Political activities	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If the project involves enlargement of a dam or levee beyond the original footprint of the structure that existed before the disaster, has pre-approval from HUD and any other Federal agencies HUD deemed necessary been obtained?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Assisting a for-profit business in any activities that will result in relocation or significant loss of jobs from one labor market to another	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Assisting a privately-owned utility for any purpose.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If eminent domain will be employed, will property be for public use? (See allowed uses of eminent domain under Section d. Displacement of Persons and Other Entities of the published Action Plan page 97)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A

### 7d. Duplicative Funding

ADECA is required by HUD to conduct an individualized DOB review to ensure that any CDBG-DR allocation is not duplicative of other funding.

A duplication of benefits (DOB) occurs when a beneficiary receives or is awarded assistance from multiple sources for a cumulative amount that exceeds the total need for a particular recovery purpose, and the total assistance received for that purpose is more than the total need for the project/program in question.

**X** Subrecipients must complete the **Duplication of Benefits addendum** provided at the end of this document and submit it with their project/program profile form. Failure to do so will deem this Activity Profile Form incomplete.

*See attached document.*

### 7e. Income Generation

Do you anticipate that this project/program will generate **program income**? (See Section 3.6.8 of the subrecipient Manual for the definition of and examples of program income.) If so, please provide details on those income generation aspects and any projections you may have at this time.

☐ Yes  
☒ No

N/A

## 8. Subrecipient Capacity

This section will be used by ADECA to determine the subrecipient's capacity to implement the proposed project/program in accordance with program and contractual requirements and to assess the compliance risk associated with the project/program.

**\*\*\*IF THIS PROJECT/PROGRAM INCLUDES A COLLABORATOR(S), THE RESPONSES BELOW SHOULD ADDRESS BOTH THE SUBRECIPIENT AND ANY COLLABORATORS\*\*\***

### 8a. Prior Experience

Does your entity possess experience implementing similar types of projects/programs as the one proposed? If yes, please list all similar projects the subrecipient/collaborator has implemented within the last 10 years.

☒ Yes  
☐ No

While the County has not implemented a homeowner assistance program in the past, it does have significant experience managing federal funds as described below. The County has procured a consulting firm, Civix Consulting Group, that has experience with these types of programs and also intends to partner with Family Promise, a nonprofit that works closely with the target population.

Also, in response to the COVID-19 pandemic, Baldwin County implemented a series of strategic projects under the CARES Act and its successor legislation, aimed at stabilizing households, protecting public health, and maintaining essential services. One of the most impactful initiatives was the Emergency Rental Assistance Program (ERAP), through which the County distributed \$8 million in federal aid to landlords and tenants affected by pandemic-related income loss.

<p>Does your entity possess experience implementing CDBG or other federally funded projects/programs? If yes, please list all federally funded projects/programs the subrecipient/collaborator has implemented within the last 10 years, as well as the funding source.</p>	<p>XYes <input type="checkbox"/>No</p>
<p>Baldwin County received a total of \$43 million in American Rescue Plan Act (ARPA) funding through the State and Local Fiscal Recovery Funds (SLFRF) program. The County has managed these funds within compliance requirements. The County also demonstrated in-house engineering and project management capabilities through efforts like the Boros Road Bowl Project, which included both a water line installation (\$1.04M) and a stormwater pond constructed by County staff (\$111K). This dual-component project showcases Baldwin County's ability to coordinate across departments and deliver cost-effective solutions. Collectively, these projects represent over \$15 million in federally funded infrastructure improvements. The County's experience with ARPA-funded projects provides a strong foundation for the successful implementation of proposed CDBG-DR activities.</p> <p>Baldwin County has received several RESTORE Act awards to support coastal restoration, infrastructure resilience, and environmental protection—funded through the Gulf Coast Restoration Trust Fund established after the Deepwater Horizon oil spill. These awards reflect the County's strategic focus on long-term sustainability and community benefit. One of the most notable RESTORE-funded initiatives is the Bon Secour River Headwaters Restoration Project, which aims to improve water quality and restore natural hydrology through wetland enhancement and sediment reduction. This project supports both ecological health and flood mitigation in a vulnerable watershed. The County also received RESTORE funding for the Wolf Bay Watershed Management Plan, a comprehensive effort to guide future development while protecting water quality, habitat, and recreational access.</p>	

<b>8b. Outstanding Monitoring or Audit Results</b>	
<p>Does your entity have any open concerns or findings related to program or project administration, fiscal administration, or grant administration, as a result of a HUD (or federal agency) monitoring review? If yes, please identify the substance of the concern(s) or finding(s) issued, the status, and the entity's efforts to resolve.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/>No</p>
<p><i>[Enter text]</i> N/A</p>	

## 9. Certifications and Assurances

Please review the following certifications and assurances in support of this Activity Profile Form. By signing and submitting this Activity Profile Form, the subrecipient certifies that all of the following are true and correct.

### Certifications

1. The information presented in this Activity Profile Form is true and correct to the best of my knowledge.
2. I certify that:
  - a. The City/County will minimize displacement of persons as a result of activities with CDBG funds and will assist persons actually displaced as a result of such activities.
  - b. The City's/County's program will be conducted and administered in conformance with Public Law 88-352 and Public Law 90-284, and the City/County will affirmatively further fair housing.
  - c. The City/County has held a public participation hearing to obtain the views of citizens on community development and housing needs.
  - d. The City/County has furnished citizens information concerning the amount of funds available for proposed community development and housing activities that may be undertaken including the estimated amount of funds proposed to be used for activities benefiting low- and moderate-income persons.
  - e. The City/County has made available to the public a summary of the proposed project to afford affected citizens an opportunity to comment.
  - f. The City/County is providing citizens with reasonable access to records on past use of CDBG funds.
  - g. The City/County will provide citizens with reasonable notice of, and opportunity to comment on, any substantial change proposed to be made in the use of CDBG funds.
  - h. The City/County will not attempt to recover any capital costs of public improvements assisted in whole or in part with CDBG funds by assessing any amount against properties owned and occupied by persons of very low, low- and moderate-income. If a fee or assessment is required, the City/County will use CDBG funds to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than CDBG funds. The City/County through proper certification to the State may assess any amounts against properties owned and occupied by persons of moderate income who are not persons of very low or low income if the City/County lacks sufficient funds received under the CDBG program to pay those costs.
  - i. The City/County is ☐ is not ☒ (please check one) delinquent on any State/Federal debt (If answered "is", attach explanation).
3. I further certify that the City/County is following a detailed Citizen Participation Plan which:
  - a. Provides for and encourages citizen participation, with particular emphasis on participation by persons of low- and moderate-income who are residents of slum and blight areas and of areas in which Section 106 funds are proposed to be used, and in the case of a grantee described in Section 106(a), provides for participation of residents in low- and moderate-income neighborhoods as defined by the local jurisdiction;



- b. Provides citizens with reasonable and timely access to local meetings, information, and records relating to the grantee's proposed use of funds, as required by regulations of the Secretary, and relating to the actual use of funds under this title;
- c. Provides for technical assistance to groups representative of persons of low- and moderate-income that request such assistance in developing proposals with the level and type of assistance to be determined by the grantee;
- d. Provides for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development program, including at least the development of needs, the review of proposed activities and review of program performance, which hearings shall be held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodation for the handicapped;
- e. Provides for a timely written answer to written complaints and grievances, within 15 working days where practicable; and
- f. Provides citizens with reasonable advance notice of, and opportunity to comment on, proposed activities not previously described in the community development application, and for activities which are proposed to be deleted or substantially changed in terms of purpose, scope, location, or beneficiaries.

### Assurances

As the duly authorized representative of the subrecipient entity, I certify that the subrecipient:

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

7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. 4728-4763) relating the prescribed standards for merit systems for programs funded under one of the nineteen statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4801 et seq.) which prohibits the use of lead-based paint in the construction or rehabilitation of residential structures.
10. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Section 109 of the Housing and Community Development Act of 1974 (HCDA), as amended, 42 U.S.C. § 5309, which prohibits discrimination on the basis of race, color, national origin, sex, and religion in any program or activity funded in whole or in part under Title I of the Community Development Act of 1974, which includes Community Development Block Grants; (b) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color, or national origin; (c) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. 1681-1683, and 1685-1686) which prohibits discrimination on the basis of sex; (d) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794) which prohibits discrimination on the basis of disability; (e) the Americans with Disabilities Act of 1990 (ADA), as amended, 42 U.S.C. § 12101 et seq. Title II of the ADA, which prohibits discrimination based on disability in programs and activities provided or made available by public entities; (f) the Architectural Barriers Act of 1968, 42 U.S.C. § 4151 et seq., which requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 to be accessible to and useable by persons with disabilities; (g) the Age Discrimination Act of 1975, as amended (42 U.S.C. 6101-6107) which prohibits discrimination on the basis of age; (h) the Drug Abuse Office and Treatment Act of 1972 (P.L. 93-255), as amended, relating to nondiscrimination on the basis of drug abuse; (i) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (j) 523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. 290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (k) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. 3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (l) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (m) the requirements of any other nondiscrimination Statute(s) which may apply to the Activity Profile Form.
11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646), as amended (P.L. 100-17) which provides for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

12. Will comply with the provisions of the Hatch Act (5 U.S.C. 1501-1508 and 7324-7328) which limit the potential activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. 276a to 276a-7), The Copeland Act (40 U.S.C. 276c and 18 U.S.C. 874), Section 3 provisions from the HUD Act of 1968 (12 U.S.C. 1701u), and the Contract Work Hours and Safety Standards Act (40 U.S.C. 327-333) regarding labor and employment standards for federally assisted construction contracts.
14. Will comply with the flood insurance purchase requirements of Section 102 (a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (c) notification of violating facilities pursuant to EO 11738; (d) protection of wetlands pursuant to EO 11990; (e) evaluation of flood hazards in flood plains in accordance with EO 11988; (f) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. 1451 et seq.); (g) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended, (42 U.S.C. 7401 et seq.); (h) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended, (P.L. 93-523); and (i) protection of endangered species under the Endangered Species Act of 1973, as amended, (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. 1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470), EO 11593 (identification and preservation of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. 469a-1 et seq.)
18. Will cause to be performed the required financial and compliance audits in accordance with Single Audit Act of 1984, as amended, and OMB Circular A-128.
19. Will comply with all applicable requirements of all other Federal laws, Executive Orders, regulations, and policies governing this program.

### Special State Assurances

The subrecipient further assures and certifies that:

1. The proposed program/project benefits principally persons of low to moderate incomes, the latter being defined as persons in households having incomes at or below applicable income limits. Specifically, the following percentages of low- and moderate-income beneficiaries serve as a minimum threshold depending on the type of project: 51 percent for public facilities activities and 100 percent for housing activities. Programs/projects should be designed so as to give maximum feasible priority to activities which will benefit low- and moderate-income

families or aid in the prevention of slums and blight. However, a proposed program/project may include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious threat to the health or welfare of the community where other financial resources are not available to meet such needs.

2. If it has a previous Community Development Block Grant Program which has not been closed out, it will, if requested by the State, present the State with documentation to adequately demonstrate that it can expeditiously close out the previous program and manage a future program.
3. The local governing body accepts the responsibility for citizen comments and concerns related to the proposed program/project.

### Anti-Displacement Assurance

As the duly authorized representative of the subrecipient entity, I certify that the subrecipient will comply with:

1. Section 104(d) of Title I of the Housing and Community Development Act of 1974, as amended. This provision, authorized by Section 509(a) of the Housing and Community Development Act of 1987, contains requirements for a residential anti-displacement and relocation assistance plan. Each State recipient must adopt, make public, and certify to the State that it is following "a residential anti-displacement and relocation assistance plan."
2. Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended through 1987, (Public Law 100-17, 101 Stat. 246-256). This provision extends Uniform Relocation Assistance coverage to any person (family individual, business, nonprofit organization, or farms) displaced as a direct result of rehabilitation, demolition, or privately undertaken acquisition carried out for a federally assisted project or program.

### Certification For Contracts, Grants, Loans, And Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan or cooperative agreement, the undersigned shall complete and submit Standard Form-LL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

3. The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

### Certification Regarding Survey

If a survey to determine project beneficiaries was undertaken for the proposed project/program, such survey was conducted with full regard to obtaining accurate information. The City/County agrees that any evidence to the contrary could result in adverse consequences, including the repayment of grant funds.

### Certification Regarding Excessive Force

In accordance with Section 519 of Public Law 101-140, (the 1990 HUD Appropriations Act), the subrecipient entity certifies that it has adopted and is enforcing a policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations.

*(END OF CERTIFICATIONS AND ASSURANCES)*



## 10. Activity Profile Form Acknowledgement and Signature

Activity Profile Forms will be evaluated as received, so the completeness of this package is paramount.

Prior to the submission of this Activity Profile Form, please take time to ensure the following are addressed:

- ✕ All applicable checkboxes and fields have a response, even if that response is N/A.
- ✕ All required attachments are submitted with this Activity Profile Form document, such as:
  - Project/program footprint map
  - Photos
  - Service area map
  - Project/program cost estimate
  - Duplication of Benefits Addendum and applicable support
  - Any additional pages needed to support a response
- ✕ Any other applicable attachments, such as:
  - Interlocal Agreement/ Memorandum of Understanding
  - Documentation of disaster impacts and losses
  - Feasibility, market, or other technical or economic study
  - Proof of commitment of non-CDBG funds

### Signature of Chief Elected Officer

I hereby certify that the information provided in this disclosure is true and correct and I am aware that making any materially false, fictitious, or fraudulent statement or representation may subject me to criminal penalties under Section 1001 of Title 18 of the United States Code. In addition, I am aware that if I materially violate any required disclosure of information, including concealing a material fact, I am subject to being fined under this title or imprisoned not more than five years, or both.

<b>Signature:</b>			
<b>Printed:</b>	<b>James E. (Jeb) Ball</b>	<b>Date:</b>	