

City of Montgomery, Alabama PY 2022 Annual Action Plan

For use of the following HUD Programs:

**Community Development Block Grant (CDBG) Program
HOME Investment Partnership Act (HOME) Program
Emergency Solutions Grant (ESG) Program**



**Prepared by
The Department of Community Development
Community Development Division**

**U.S. Department of Housing and Urban Development
Birmingham Field Office
The Plaza
417 20th Street North
Suite 700
Birmingham, AL 35203**

*****THIS DOCUMENT IS PUBLISHED FOR A 30-DAY PUBLIC COMMENT PERIOD BEGINNING JUNE 26, 2022. ALL COMMENTS RECEIVED MUST BE SUBMITTED BY 5:00 P.M. ON JULY 29, 2022.*****

PUBLIC NOTICE PY 2022 ACTION PLAN (ENGLISH & SPANISH VERSIONS)

**CITY OF MONTGOMERY
U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT (HUD)
NOTICE OF PROGRAM YEAR (PY) 2022
ACTION PLAN**

The City of Montgomery has developed a DRAFT of its proposed one-year Action Plan for PY 2022, which will be the third program year of the Consolidated Plan (PY 2020-2024). The Consolidated Plan consists of a detailed analysis of the City's homeless, community development needs, resources anticipated for housing, and a five-year strategy for targeting these resources. The PY 2022 Action Plan summary includes resources available by the U.S. Department of Housing and Urban Development (HUD), and describes proposed activities to address homelessness, housing, and non-housing community development needs in the City of Montgomery using these resources.

A copy of the summary of the PY 2022 Action Plan is available for public review at the Department of Community Development, 25 Washington Avenue, 4th Floor, Montgomery, AL 36104 or on the City's webpage at the following link - <https://www.montgomeryal.gov/city-government/departments/community-development/community-development-division>. A thirty-day review period from date of publication of this Notice is provided so as to give the public adequate opportunity to review and comment on the proposed Plan. A summary of all written comments received during the thirty-day review period will be included when the Plan is submitted to HUD.

Comments concerning the City of Montgomery's PY 2022 Action Plan must be in writing by 5:00 p.m. on July 29, 2022 and mailed to:

City of Montgomery
Department of Community Development
25 Washington Avenue, 4th Floor
Montgomery, AL 36104
or by email @ akramer@montgomeryal.gov

**CIUDAD DE MONTGOMERY
DEPARTAMENTO DE VIVIENDA Y
DESARROLLO URBANO (HUD)
AVISO DE PROGRAMA AÑO (PY) 2022
PLAN DE ACCION**

La Ciudad de Montgomery ha desarrollado un BORRADOR de su Plan de Acción de un año propuesto para PY 2022, que será el tercer año programático del Plan Consolidado (PY 2020-2024). El Plan Consolidado consiste en un análisis detallado de las necesidades de desarrollo comunitario de las personas sin hogar de la Ciudad, los recursos anticipados para la vivienda y una estrategia de cinco años para orientar estos recursos. El resumen del Plan de Acción de PY 2022 incluye recursos disponibles por el Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos (HUD, por sus siglas en inglés), y describe las actividades propuestas para abordar las necesidades de desarrollo comunitario sin hogar, vivienda y no vivienda en la Ciudad de Montgomery utilizando estos recursos.

Una copia del resumen del Plan de Acción PY 2022 está disponible para revisión pública en el Departamento de Desarrollo Comunitario, 25 Washington Avenue, 4th Floor, Montgomery, AL 36104 o en la página web de la Ciudad en el siguiente enlace- <https://www.montgomeryal.gov/city-government/departments/community-development/community-development-division>. Se proporciona un periodo de revisión de treinta días a partir de la fecha de publicación de este Aviso para dar al público la oportunidad adecuada de revisar y comentar el Plan propuesto. Se incluirá un resumen de todos los comentarios escritos recibidos durante el periodo de revisión de treinta días cuando el Plan se envíe a HUD.

Los comentarios sobre el Plan de Acción PY 2022 de la Ciudad de Montgomery deben enviarse por escrito antes de las 5:00 p.m. del 29 de julio de 2022 y enviarse por correo a:

Ciudad de Montgomery
Departamento de Planificación
25 Washington Avenue, cuarto piso
Montgomery, AL 36104
o por correo electrónico @ akramer@montgomeryal.gov
Mont Adv., 6/26
0005314895

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The purpose of the City Montgomery's PY 2022 Action Plan is to develop a viable urban community by providing decent housing, and a suitable living environment, principally for low and moderate-income persons, and programs that will address the needs of homeless and near homeless persons. The plan sets forth how three (3) HUD grants, the Community Development Block Grant (CDBG), HOME Investment Partnership Grant (HOME), and Emergency Solutions Grant (ESG) will be used as investment priorities to achieve specific HUD objectives, outcomes, and performance measures.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The City's goals for the 2020-2024 planning period focuses on continuing neighborhood revitalization efforts, providing affordable housing and assisting low-income, public service, homeless, and special needs residents with supportive services. Specifically, the City of Montgomery will provide for the following during PY 2021:

Affordable Housing:

Increase the availability of affordable housing by supporting the following -

- Rental units constructed - up to **85 Household Housing Units**
- Rental units rehabilitated – **0 Household Housing Units**
- Homeowner housing rehabilitated – at least **25 Household Units**

Suitable Living Environment:

Collaborate with local non-profit agencies/organizations as well as City of Montgomery departments to facilitate the following -

- Public facility or infrastructure activities other than Low/Moderate Income Housing Benefit – **0 Persons Assisted**

- Public facility or infrastructure activities for Low/Moderate Income Housing Benefit – **up to 55 Households Assisted**
- Public services activities other than Low/Moderate Income Housing Benefit – **2430 Persons Assisted**
- Jobs created/retained – **0 Jobs**
- **Homelessness**

Support emergency shelters and/or homeless prevention agencies/organizations in their operation/maintenance of the following -

- Tenant-based rental assistance/Rapid Rehousing – **5 Households Assisted**
- Homeless person overnight shelter – **480 Persons Assisted**
- Other (HMIS) – **1 Other**

Administration:

General administration of programs for Program Year (PY) 2022 as follows –

- Community Development Block Grant (CDBG) – **\$332,992**
- HOME – **\$96,887**
- Emergency Solutions Grant (ESG) – **\$11,001**

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The City is in the third year of its current Five-Year Consolidated Plan (PY 2020-2024). The City's PY 2021 CAPER is currently being prepared for submission to HUD and the following information is being provided for the PY 2020 Action Plan.

Under Homelessness, the goal was to expand housing and services offered to homeless families and individuals in Montgomery. Under this goal, objectives set forth were to support tenant-based rental assistance/rapid rehousing programs. Two (2) organizations were provided ESG funds to meet this goal through existing emergency shelter and homeless prevention services. At the end of PY 2020, the City's percentage of completeness was at 65.56%. It is expected that the City fully meet this goal after progress is reported during submission of its PY 2021 CAPER. Another goal was the provision of homeless person overnight shelter. The objectives set forth were to improve awareness and provide access to emergency shelter services. After PY 2020, the percentage of completeness of this goal was 6.88%, but the City intends to exceed this goal by its third year into the Consolidated Plan.

The overall goal for affordable housing under previous plans has been to improve quality and availability of affordable housing by at least 25 units. With regard to public facility or infrastructure in support of affordable housing, the PJ's objective will be met or exceeded for the number of households assisted during the 2020-2024 Strategic Plan period. Through the first two years of the Plan period, with production severely protracted due to effects of the COVID-19 pandemic, one (1) CDBG Subrecipient provided critical ("emergency") home repairs for four (4) low-to-moderate income homeowners. All 4 rehabilitated homes are owner occupied. By the end of PY 2021, the PJ used HOME funds to place two (2) rehabilitated affordable units and six (6) new affordable units into service for occupancy.

The PJ anticipates exceeding HOME funded housing goals within the fifth year of the Plan.

The PJ sought but did not certify any new Community Housing Development Organizations (CHDOs) during the strategic period.

Under Non-Housing Community Development, the City has designated four (4) goals – 1) Public Facility/Infrastructure for low-moderate income areas (LMA) - in the first year of the Consolidated Plan, this goal has been met and exceeded by 655%; 2) Public Facility/Infrastructure (low/moderate income housing benefit) - this goal will be reported in the PY 2021 CAPER as being 60% complete; 3) Public Service Activities (other than housing benefit) – during PY 2020, this goal has been met and exceeded by 217% in the first year's annual goals/outcomes; and, 4) Jobs created/retained – the City intends to solicit applications for economic development through its annual application intake to meet this goal before year five (5) of the Consolidated Plan (PY 2020 – 2024). During PY 2020 and 2021, the City funded non-profit organizations for public services activities in CDBG funding for activities such as free/reduced fee health services for those experiencing chronic medical conditions through primary care, medication, and nutrition education; academic enrichment and mentoring for youth; implementation of positive character and social skills development program for at-risk youth; and, mentoring/tutoring program for at-risk youth during summer months and after school.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

During the development of the Action Plan, the City of Montgomery reports the following regarding citizen participation and consultation:

- Advertisement in a local newspaper of general circulation (Montgomery Advertiser) was printed on June 26, 2022. Proposed PY 2022-Action Plan - will be submitted to City Council for review and approval by Resolution.

While under a 30-day comment period, comments received by the City from the public will be included in the submission of this Plan.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

All comments received during the public comment period for the City's PY 2022 Annual Action Plan will be included in the submission of this Plan.

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments received during the public comment period for the City's PY 2022 Annual Action Plan will be included in the submission of this Plan.

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PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

| Agency Role | Name | Department/Agency |
|--------------------|------------|-------------------------------------|
| CDBG Administrator | MONTGOMERY | Department of Community Development |
| HOME Administrator | MONTGOMERY | Department of Community Development |
| ESG Administrator | MONTGOMERY | Department of Community Development |

Table 1 – Responsible Agencies

Narrative (optional)

The Department of Community Development, Community Development Division, serves as the lead agency for the CDBG, HOME and ESG Programs. During the preparation of the PY 2020-2024 Consolidated Plan, the City solicited input from governmental agencies as well as various public and private agencies providing health and social services. The City will continue to form new partnerships with non-profit organizations, the private sector and other local resources to advance the priorities outlined in this Consolidated Plan.

Funds are provided to non-profits through a competitive application process. The Community Development Division will take the lead to ensure appropriate coordination of the following:

- Providing technical assistance to potential Subrecipients;
- Carry out the statutory requirements of the CDBG, HOME, and ESG Programs; and,
- Manage planning studies for neighborhoods

Consolidated Plan Public Contact Information

The Consolidated Plan Public Contact for the City of Montgomery, Alabama is as follows:

Desmond Wilson, Director

Department of Community Development

25 Washington Avenue, 4th Floor

Montgomery, AL 36104

Phone: (334) 625-2735

Fax: (334) 625-4432

Email: dwilson@montgomeryal.gov

Website: www.montgomeryal.gov

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AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

The Consultation Process for the PY 2022 Action Plan consisted of conducting meeting and discussions with City government leaders, key stakeholders and social agencies to decide which agencies, projects and activities would be funded during Program Year (PY) 2022. The activities considered for funding were based on the results and priorities derived during the Consolidated Plan process. The consultation was similar to the Citizen Participation Process whereby separate meetings were held for agency and service providers. Once the projects were selected for the Action Plan, copies of the draft Action Plan were placed on the City's website as well as made available in the Community Development Office for public review and comment. Due to COVID-19 restrictions, the City's Plans are not currently available for review at public locations such as the libraries as in previous years. The availability of the Plan and locations for review are indicated in the City's advertisement of Public Notice placed in the Montgomery Advertiser and attached at AD-25 in the Grantee's Appendices.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))

In preparing the PY 2022 Action Plan, the City of Montgomery conducted consultations with key stakeholders in an effort to have an in-depth understanding of agencies and their missions, impediments, and funding needs. In addition to selecting projects for the Plan, discussions included how to best form partnerships and collaborations for leveraging other federal, state, and local funding in an effort to serve a greater population. Consultation for this Action Plan took place with the following: 1) City of Montgomery government to include the Mayor's office, City Council, Department Community Development/Community Development Division, Public Works, and Parks and Recreation; 2) State agency - Alabama Department of Public Health; 3) Affordable housing provider agencies and homeowner rehabilitation for low-income persons and families such as Aletheia House, Inc., and Community Action Agency of North Alabama (CAPNA) which serve as the City's Community Housing Development Organizations (CHDOs) and affordable housing partner, Heritage Training and Career Center, Inc., and the Montgomery Housing Authority (MHA), which provides public housing to low-income persons and families; and 3) Public Service providers such as the Boys & Girls Clubs of the River Region, Montgomery Education Foundation, Montgomery STEP Foundation - all provide services to at-risk youth as well as the Montgomery Area Community Wellness Center, Health Services, Inc., and Medical Outreach Ministries - agencies providing healthcare programs to uninsured/underinsured residents in the City of Montgomery; and, 4) Homelessness and Domestic Violence providers such as Mid-Alabama Coalition for the Homeless (MACH) - responsible for the Continuum of Care; and, the Montgomery Area Violence Program d/b/a Family Sunshine Center - the City's domestic violence and sexual assault agency provider and Friendship Mission (Men and Women's Shelter).

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City of Montgomery has an extensive relationship with the Mid-Alabama Coalition for the Homeless (MACH). MACH serves as the Continuum of Care organization - a requirement by HUD for the City of Montgomery. MACH addresses the needs of the homeless in five Alabama counties: Montgomery, Autauga, Bullock, Elmore, and Lowndes. As the Continuum of Care for this area, MACH is responsible for examining homelessness issues, devising methods to alleviate homelessness, providing services to the homeless and to those at risk of becoming homeless and conducting a yearly survey through the Point-In-Time (PIT) Count of homeless individuals within its geographic boundaries.

Community Development Staff (ESG Program Manager, Grants Administrator, and Director of Community Development) plays an active role in MACH's organization. City attendance and participation in MACH meetings plays a crucial role in its ability to receive funding from HUD through the Continuum of Care (CoC) Competition. Community Development staff also plays a crucial role in the Peer Review Selection Process for the CoC Application process by serving on a committee for application presentation and review. During 2022, the Mayor formed a committee derived of homeless agency providers, the CoC, and HMIS provider to address a homeless initiative to combat chronic homelessness. The Community Development Department Director will meet with all shelter providers and the COC to continue the planning process of assessing past homelessness activities and lay groundwork for a new plan to address homelessness for the City focusing on street outreach and coordinated entry and assessment.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The Mid-Alabama Coalition for the Homeless (MACH) serves in the capacity of partner and advisor to the City and Community Development Staff regarding ESG regulations and policy. MACH plays a major role in assisting City staff in developing its ESG application process, evaluating, scoring and selecting applicants for ESG funding. MACH can also apply for the City's ESG funds, but it is not allowed to evaluate and select its own application. MACH manages Homeless Prevention and Rapid-Rehousing project activities within the HESG Program for the City. MACH also plays a key role in assessing the City's current climate for homelessness and devising a new long-term plan for assisting this population.

The Homeless Management Information System (HMIS) is a computerized database that allows organizations that provide services to people experiencing homelessness to collect client information, track services and generate reports. HMIS is managed by a nonprofit organization called "HandsOn River

Region (formerly Volunteer and Information Center).” HandsOn River Region services a five-county River Region in Central Alabama to include Montgomery, Autauga, Elmore, Lowndes, and Macon Counties.

MACH partners with HandsOn River Region in HMIS as part of the Continuum of Care to provide standardized and timely information to improve access to housing and services, and strengthen the efforts to end homelessness. Together, MACH assists HandsOn with HMIS in collecting individual client information (gender, age, ethnicity, etc.), household information (housing status, services provided, income, etc.), allowing providers to selectively share client data with other service providers, and producing reports required by the U.S. Dept. of Housing & Urban Development, City of Montgomery Community Development Office and other local and state funding programs.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities

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Table 2 – Agencies, groups, organizations who participated

| | | |
|---|---|--|
| 0 | <p>Agency/Group/Organization</p> | <p>Mid-Alabama Coalition for the Homeless</p> |
| | <p>Agency/Group/Organization Type</p> | <p>Services-homeless</p> |
| | <p>What section of the Plan was addressed by Consultation?</p> | <p>Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy</p> |
| | <p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p> | <p>The City arranged group agency meetings with a broad community audience. These agencies completed surveys with the general public and discussed particular topics important within its own targeted population (homeless). The City will coordinate future activity between itself and the agencies as it relates to future City/HUD funding and other possible resources.</p> |
| 2 | <p>Agency/Group/Organization</p> | <p>FAMILY SUNSHINE CENTER</p> |
| | <p>Agency/Group/Organization Type</p> | <p>Services-Children Services-Victims of Domestic Violence Services-homeless</p> |
| | <p>What section of the Plan was addressed by Consultation?</p> | <p>Homeless Needs - Families with children Homelessness Strategy</p> |
| | <p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p> | <p>The City arranged group agency meetings with a broad community audience. These agencies completed surveys with the general public and discussed particular topics important within its own targeted population (domestic violence, homeless). The City will coordinate future activity between itself and the agencies as it relates to future City/HUD funding and other possible resources.</p> |
| 3 | <p>Agency/Group/Organization</p> | <p>Friendship Mission Inc.</p> |
| | <p>Agency/Group/Organization Type</p> | <p>Services-homeless</p> |

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|---|---|---|
| | <p>What section of the Plan was addressed by Consultation?</p> | <p>Homeless Needs - Families with children</p> |
| | <p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p> | <p>The City arranged group agency meetings with a broad community audience. These agencies completed surveys with the general public and discussed particular topics important within its own targeted population (homeless). The City will coordinate future activity between itself and the agencies as it relates to future City/HUD funding and other possible resources.</p> |
| 4 | <p>Agency/Group/Organization</p> | <p>HandsOn River Region</p> |
| | <p>Agency/Group/Organization Type</p> | <p>Services-homeless HMIS</p> |
| | <p>What section of the Plan was addressed by Consultation?</p> | <p>Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy HMIS</p> |
| | <p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p> | <p>The City arranged group agency meetings with a broad community audience. These agencies completed surveys with the general public and discussed particular topics important within its own targeted population (homeless). The City will coordinate future activity between itself and the agencies as it relates to future City/HUD funding and other possible resources.</p> |
| 5 | <p>Agency/Group/Organization</p> | <p>MONTGOMERY AREA WELLNESS COALITION-MAWC</p> |
| | <p>Agency/Group/Organization Type</p> | <p>Services-Health</p> |
| | <p>What section of the Plan was addressed by Consultation?</p> | <p>Healthcare for low-income population</p> |

| | | |
|---|---|---|
| | <p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p> | <p>The City arranged group agency meetings with a broad community audience. These agencies completed surveys with the general public and discussed particular topics important within its own targeted population (healthcare for uninsured/underinsured). The City will coordinate future activity between itself and the agencies as it relates to future City/HUD funding and other possible resources.</p> |
| 6 | <p>Agency/Group/Organization</p> | <p>MEDICAL OUTREACH MINISTRIES</p> |
| | <p>Agency/Group/Organization Type</p> | <p>Services-Health</p> |
| | <p>What section of the Plan was addressed by Consultation?</p> | <p>Healthcare for low-income population</p> |
| | <p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p> | <p>The City arranged group agency meetings with a broad community audience. These agencies completed surveys with the general public and discussed particular topics important within its own targeted population (healthcare for uninsured/underinsured). The City will coordinate future activity between itself and the agencies as it relates to future City/HUD funding and other possible resources.</p> |
| 7 | <p>Agency/Group/Organization</p> | <p>Alabama Department of Public Health</p> |
| | <p>Agency/Group/Organization Type</p> | <p>Services-Children Services-Health Other government - State</p> |
| | <p>What section of the Plan was addressed by Consultation?</p> | <p>Lead-based Paint Strategy</p> |

| | | |
|---|---|--|
| | <p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p> | <p>The City does not have, nor anticipate having construction/home rehabilitation projects where lead-based paint hazards are present. The City will continue its communication with the ADPH and consult with them when presented with lead-based paint hazards in home rehabilitation projects where children under the age of six (6) reside. The agency completed surveys with the general public and discussed particular topics related to lead-based paint. The City will coordinate future activity between itself and the agency as it relates to future City/HUD funding and other possible resources.</p> |
| 8 | <p>Agency/Group/Organization</p> | <p>Montgomery Housing Authority</p> |
| | <p>Agency/Group/Organization Type</p> | <p>PHA</p> |
| | <p>What section of the Plan was addressed by Consultation?</p> | <p>Public Housing Needs</p> |
| | <p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p> | <p>The City arranged group agency meetings with a broad community audience. These agencies completed surveys with the general public and discussed particular topics important within its own targeted population (healthcare for uninsured/underinsured). The City will coordinate future activity between itself and the agencies as it relates to future City/HUD funding and other possible resources.</p> |
| 9 | <p>Agency/Group/Organization</p> | <p>COMMUNITY ACTION PARTNERSHIP OF NORTH ALABAMA, INC.</p> |
| | <p>Agency/Group/Organization Type</p> | <p>Housing</p> |
| | <p>What section of the Plan was addressed by Consultation?</p> | <p>Housing Need Assessment</p> |

| | |
|---|---|
| <p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p> | <p>The City arranged group agency meetings with a broad community audience. These agencies completed surveys with the general public and discussed particular topics important within its own targeted population (housing for low-income). The City will coordinate future activity between itself and the agencies as it relates to future City/HUD funding and other possible resources.</p> |
| <p>10</p> | <p>CITY OF MONTGOMERY</p> |
| <p>Agency/Group/Organization Type</p> | <p>Other government - Local</p> |
| <p>What section of the Plan was addressed by Consultation?</p> | <p>Neighborhood & Community Development</p> |
| <p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p> | <p>The City arranged group agency meetings with a broad community audience. These agencies completed surveys with the general public and discussed particular topics important within its own targeted population (neighborhood and community development). The City will coordinate future activity between itself and the agencies as it relates to future City/HUD funding and other possible resources.</p> |
| <p>11</p> | <p>Montgomery Education Foundation</p> |
| <p>Agency/Group/Organization Type</p> | <p>Services-Education</p> |
| <p>What section of the Plan was addressed by Consultation?</p> | <p>Community Development Public Service</p> |
| <p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p> | <p>The City arranged group agency meetings with a broad community audience. These agencies completed surveys with the general public and discussed particular topics important within its own targeted population (low-income households). The City will coordinate future activity between itself and the agencies as it relates to future City/HUD funding and other possible resources.</p> |

| | | |
|----|---|--|
| 12 | Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Boys and Girls Clubs of the River Region Services - At-Risk Youth Community Development Public Service The City arranged group agency meetings with a broad community audience. These agencies completed surveys with the general public and discussed particular topics important within its own targeted population (community development public service). The City will coordinate future activity between itself and the agencies as it relates to future City/HUD funding and other possible resources. |
| 13 | Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | MONTGOMERY STEP FOUNDATION Services - At-Risk Youth Community Development Public Service The City arranged group agency meetings with a broad community audience. These agencies completed surveys with the general public and discussed particular topics important within its own targeted population (community development public service). The City will coordinate future activity between itself and the agencies as it relates to future City/HUD funding and other possible resources. |
| 14 | Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? | Heritage Training and Career Center Services - Housing Housing Need Assessment |

| | | |
|--|---|--|
| | <p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p> | |
|--|---|--|

Identify any Agency Types not consulted and provide rationale for not consulting

The City made an effort to consult with a variety of agencies and organizations (housing for low-income) via public hearing, written correspondence, and phone calls. No organizations or individuals were deliberately omitted from the process.

Other local/regional/state/federal planning efforts considered when preparing the Plan

| Name of Plan | Lead Organization | How do the goals of your Strategic Plan overlap with the goals of each plan? |
|-----------------------------------|--|---|
| Continuum of Care | Mid-Alabama Coalition for the Homeless (MACH) | The City's five-year goals are a guide to the one-year goals and objectives as listed in the City's Action Plans. |
| Consolidated & Annual Action Plan | Alabama Department of Economic & Community Affairs (ADECA) | The City's five-year goals are a guide to the one-year goals and objectives as listed in the City's Action Plans. |

Table 3 – Other local / regional / federal planning efforts

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The Action Plan process requires a regulatory 30-day public comment period. A public notice was placed in the Montgomery Advertiser newspaper informing citizens that a draft of the City's intent usage of HUD's CDBG, HOME, and ESG program funds during PY 2022 was available for review and comment for 30 days. A copy of the summary of the PY 2022 Action Plan was made available for public review at the Department of Economic & Community Development, Community Development Office, 25 Washington Avenue, 4th Floor, Montgomery, AL 36104 and on the City's webpage at the following link - <https://www.montgomeryal.gov/city-government/departments/community-development/community-development-division>. The public comment period began on XXX and ended XXX.

Citizen Participation Outreach

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (if applicable) |
|------------|------------------|------------------------------|--|---|---|---------------------|
| 1 | Newspaper Ad | Non-targeted/broad community | The draft Action Plan was advertised and made available for public comment at the Department of Community Development, Community Development Division, 25 Washington Avenue, 4th Floor, Montgomery, AL 36104. The draft was also made available on the City's webpage at the following link - https://www.montgomeryal.gov/city-government/departments/community-development/community-development-division for a 30-day period. | No comments were received during the public comment period for the City's PY 2022 Annual Action Plan. | No comments were received during the public comment period for the City's PY 2022 Annual Action Plan. | |

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The CDBG Program will use its administration cap at 20% of its total allocation (\$1,64,961) - \$332,992 annually.

The HOME Program will use its administration cap at 10% of its total allocation (\$968,867) - \$96,887 annually.

The ESG Program will use its administration cap at 7.5% of its total allocation (\$146,682) - \$11,001 annually.

Anticipated Resources

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|--|----------------------------------|--------------------|--------------------------|---|---|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | | |
| CDBG | public - federal | Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services | 1,664,961 | 0 | 0 | 1,664,961 | CDBG funds will be used for program administration, public service activities, housing rehab, and public facility improvements/rehab. |
| | | | | | | 3,376,277 | |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Narrative Description |
|---------|------------------|---|----------------------------------|--------------------|--------------------------|-----------|--|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | |
| HOME | public - federal | Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA | 968,867 | 0 | 0 | 968,867 | HOME funds will be used for program administration, development/new construction and rental of affordable housing, CHDO Reserve, and CHDO Operating Costs. |
| | | | | | | 1,772,082 | |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|---|----------------------------------|--------------------|--------------------------|-----------|---|---|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| ESG | public - federal | Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing | 146,682 | 0 | 0 | 146,682 | 438,366 | The CDBG Program will use its administration cap at 20% of its total allocation (\$1,719,618) - \$343,924 annually. The HOME Program will use its administration cap at 10% of its total allocation (\$907,387) - \$90,739 annually. The ESG Program did not receive funding during PY 2021. ESG funds will be used for program administration, operations and maintenance of homeless shelters, and homeless prevention and rapid re-housing activities. |

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

CDBG funds will leverage approximately \$249,500 in private and local resources in public service activities during PY 2022. CDBG funds will also leverage approximately \$27,437,541 in construction activities from private and State resources.

PY 2022 HOME funds will leverage approximately \$27,614,409 in private and State AHFA (LIHTC) funding resources for the affordable housing

development of up to 85 townhome rental units for low-income households - The Cottages at Peacock Place, LTD. CDBG funds (\$724,914) will be used in this HOME project for implementation of infrastructure improvements.

ESG funds will leverage a minimum of \$135,681 during PY 2022.

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If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The Cottages at Peacock Place affordable rental development is planned for funding and construction of approximately 85 affordable housing units during the 2020-2024 Plan period on a combination of donated surplus PJ-owned parcels and privately owned parcels, which were previously developed and abandoned over time. In addition, the PJ has a current inventory within its jurisdiction of scattered-site lots from years of demolition that are subject to potential use in federal and other housing initiatives and/or programs.

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Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|-----------------------------------|------------|----------|--|--|-----------------|--|---|
| 1 | Affordable Housing | 2020 | 2024 | Affordable Housing Public Housing | Downtown Area & North Montgomery Southside Montgomery | Housing | CDBG: \$1,144,223 HOME: \$871,980 ESG: \$0 | Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefited: 56 Households Assisted Rental units constructed: 56 Household Housing Unit Rental units rehabilitated: 25 Household Housing Unit |
| 2 | Non-Housing Community Development | 2020 | 2024 | Homeless Non-Homeless Special Needs Non-Housing Community Development | Citywide Downtown Area & North Montgomery | Public Services | CDBG: \$249,744 HOME: \$0 ESG: \$0 | Public service activities other than Low/Moderate Income Housing Benefited: 2430 Persons Assisted |

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|------------------------|------------|----------|--|-----------------|---|--|--|
| 3 | Homelessness | 2020 | 2024 | Homeless Non-Housing Community Development | Citywide | Homeless Services | ESG: \$135,681 | Tenant-based rental assistance / Rapid Rehousing: 5 Households Assisted Homeless Person Overnight Shelter: 480 Persons Assisted Other: 1 Other |
| 4 | Program Administration | 2020 | 2024 | Administration | Citywide | Homeless Services Infrastructure Housing Public Services | CDBG: \$332,992 HOME: \$96,887 ESG: \$11,001 | Other: 3 Other |

Table 6 – Goals Summary

Goal Descriptions

| | | |
|---|------------------|--|
| 1 | Goal Name | Affordable Housing |
| | Goal Description | <p>Goal Outcome Indicator totals were derived from the following affordable housing activities -</p> <ul style="list-style-type: none"> The Cottages at Peacock Place (Rental) - CDBG Program (Infrastructure Improvements) & HOME Program (Construction) funds Magnolia Trace Apartments Critical Repair Housing Rehab Program |

| | | |
|---|--|--|
| 2 | <p>Goal Name</p> <p>Non-Housing Community Development</p> | <p>Goal Description</p> <p>Goal Outcome Indicator numbers were derived from the following non-profit organizations providing public service activities -</p> <ul style="list-style-type: none"> • Boys & Girls Clubs of the River Region • Montgomery Education Foundation • Montgomery STEP Foundation • Medical Outreach Ministries |
| 3 | <p>Goal Name</p> <p>Homelessness</p> | <p>Goal Description</p> <p>The benefit totals listed in Goal Outcome Indicators were derived from the following agencies -</p> <ul style="list-style-type: none"> • Tenant-based Rental Assistance/Rapid Rehousing - Mid-Alabama Coalition for the Homeless • Homeless Person Overnight Shelter - Family Sunshine Center and Friendship Mission, Inc. • OTHER- HandsOn River Region (HMIS) |
| 4 | <p>Goal Name</p> <p>Program Administration</p> | <p>Goal Description</p> |

Projects

AP-35 Projects – 91.220(d)

Introduction

CDBG and HOME projects listed in this section are eligible according to HUD Rules and Regulations under 24 CFR Part 570 (CDBG), Part 92 (HOME), and Part 576 (ESG). The City will not receive ESG funding during PY 2022.

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The City of Montgomery established priorities and goals/objectives based off of public surveys as well as identification of community-based needs during its submission of a Five-Year Consolidated Plan (PY 2020-2024). Through community meetings and consultations with key stakeholders, data derived from all sources listed herein served as a guide for addressing underserved needs and priorities for selections of funding within the CDBG, HOME, and ESG Programs.

AP-38 Project Summary
Project Summary Information

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CITY OF MONTGOMERY – PY 2022 PROPOSED FUNDING FOR CDBG/HOME/ESG PROGRAMS

| ORGANIZATION | DESCRIPTION | COMMUNITY PRIORITY | AMOUNT FUNDED |
|---|--|--------------------|---------------|
| 1. Community Services (15% HUD CAP) | | | |
| Montgomery STEP Foundation | S.T.E.P. will provide three (3) full-time Project Specialists to establish an effective character and social skills program through its <i>Positive Character and Social Skills Development Project</i> available to low-income, at-risk students at Seth Johnson Elementary School, McKee Middle School, and McIntyre Comprehensive Academy | 6 | \$ 75,000 |
| Montgomery Education Foundation | Provision of a Summer Learning Program - a full-day, five week academic enrichment program implemented in partnership with MPS and Montgomery Parks & Recreation. This summer's program will serve MPS students with the three (3) most challenged schools - Davis Elementary, Nixon Elementary, and Bellingrath Middle School | 6 | \$ 75,000 |
| Medical Outreach Ministries | Medical Outreach Ministries' <i>Extra Care for Chronic Conditions</i> project will help high-risk, low-income adults access primary and specialty healthcare to manage their chronic conditions with provision of medications, nutrition education, access to cardiac rehab services, on-site dental clinic, and diabetes self-management | 6 | \$ 49,872 |
| Boys & Girls Clubs of the River Region | Implementation of <i>Project Learn</i> at West End and Chisholm Clubs – a mentoring and tutoring program for at-risk youth designed to enhance skills and knowledge after school (3p-9p) and during summer months (9a-5p). Project Learn will address and emphasize parental involvement and collaboration between Club and school professionals as critical factors for a successful learning environment | 6 | \$ 49,872 |
| 2. Rehabilitation | | | |
| Homeowner Emergency Rehab (Heritage Training & Career Center) | Critical Home Repair Housing Rehabilitation Program for low-moderate income homeowners | 3 | \$334,772 |
| 3. Community Facilities | | | |
| N/A | | | |
| 4. Public Improvements | | | |
| Vantage Development, LLC | Provision of infrastructure improvements in conjunction with HOME funds to construct a 55-unit townhome development – The Cottages at Peacock Place. Rental units will be available to low-income tenants | 2 | \$724,914 |
| 5. Homeless Facilities & Services | | | |
| N/A | | | |
| 6. Administration (20% HUD CAP) | | | |
| CDBG Administration and Capacity Building | | N/A | \$332,992 |
| TOTAL CDBG FUNDING AMOUNT | | | \$1,664,961 |



CITY OF MONTGOMERY – PY 2022 PROPOSED FUNDING FOR CDBG/HOME/ESG PROGRAMS

| ORGANIZATION | DESCRIPTION | COMMUNITY PRIORITY | AMOUNT FUNDED |
|--------------------------------------|---|--------------------|------------------|
| HOME Program | | | |
| HOME Affordable Housing Development | HOME Program funds will be used in the form of loans for construction and/or permanent or gap financing to develop affordable rental housing units. The PY 2022 allocation of HOME project funds (\$678,207) will be made available among non-profit and for-profit organizations to provide affordable rental housing consisting of approximately 55 townhome or similar units in the area formerly referred to as the Peacock Tract in west Montgomery - adjacent to downtown Montgomery along the historic Civil Rights Trail. | 3 | \$ 678,207 |
| HOME CHDO Reserve | At least 15% of the PY 2022 HOME allocation (\$145,330) must be used by certified Community Housing Development Organizations (CHDOs) according to HUD statutory requirements. Prior year (PY 2021) HOME funds had been allocated to develop affordable housing at the Freedom Village Senior Housing development (Lanier Place-2, Phase IV). | 3 | \$ 145,330 |
| HOME CHDO Operating Costs/Assistance | Certified CHDOs, in conducting operations for the purpose of meeting published affordable housing objectives of the PI (not project-specific), will be assisted with HOME CHDO Operating Cost assistance grants, subject to HOME statutory limitations and restricted to eligible costs of employee salaries, wages, & benefits; employee education, training and travel; rent; utilities; communication costs; taxes; insurance; equipment; and materials and supplies (not related to direct costs of housing development). | 3 | \$ 48,443 |
| 2. Administration (10% CAP) | | | |
| HOME Administration | | N/A | \$ 96,887 |
| TOTAL HOME FUNDING AMOUNT | | | \$968,867 |

| ORGANIZATION | DESCRIPTION | COMMUNITY PRIORITY | AMOUNT FUNDED |
|--|---|--------------------|------------------|
| 1. ESG Program | | | |
| Family Sunshine Center | Operations and maintenance of homeless shelter program housing victims of domestic violence, sexual assault, dating violence, and stalking | 1 | \$ 46,409 |
| Friendship Mission | Operations and maintenance of homeless shelter program for women and children | 1 | \$ 35,000 |
| Mid-Alabama Coalition for the Homeless, Inc. | Homelessness Prevention and Rapid Re-housing, Rent Assistance, and Financial Assistance will be provided to clients meeting HUD eligibility guidelines. This assistance may include rent payments, security deposits, rental arrears, application fees, and moving expenses | 1 | \$ 24,272 |
| HandsOn River Region | Management of the Homeless Management and Information System (HMIS) | 1 | \$ 30,000 |
| 2. Administration (7.5% CAP) | | | |
| ESG Administration | Administrative costs | N/A | \$ 11,001 |
| TOTAL ESG FUNDING AMOUNT | | | \$146,682 |

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

As previously mentioned in this Consolidated Plan the City will not target one specific area/community in its jurisdiction with HUD funds. Funds will be designated in areas as the needs are derived. CDBG funds will be used to address the needs on a citywide basis with the beneficiary being an individual of low-to moderate income (limited-clientele benefit). However, activities that provide a benefit on an area basis do so in areas that are determined to be primarily residential and have a low-to moderate income population of at least 51%. HOME funds will be used to address the needs on a citywide basis with the beneficiaries being individuals/household units of low income status. ESG funds will be used to support agencies that serving the homeless population (extremely low income) on a citywide basis.

Geographic Distribution

| Target Area | Percentage of Funds |
|----------------------------------|----------------------------|
| Citywide | 98 |
| Downtown Area & North Montgomery | 2 |
| Westside of Montgomery | |
| Southside Montgomery | |

Table 7 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City of Montgomery does not allocate investments in target areas geographically as they are allocated to address needs throughout the jurisdiction.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City is pursuing plans to assist construction of up to fifty-six (56) rental units at Magnolia Trace Apartments, plus 85 rental townhome units at The Cottages at Peacock Place using PY 2022 HOME program funds. Through PY 2022 CDBG funds, the City expects to rehabilitate at least twenty-five (25) single-family dwellings (homeowner occupied) through a local non-profit organization.

| One Year Goals for the Number of Households to be Supported | |
|---|-----|
| Homeless | 0 |
| Non-Homeless | 158 |
| Special-Needs | 8 |
| Total | 166 |

Table 8 - One Year Goals for Affordable Housing by Support Requirement

| One Year Goals for the Number of Households Supported Through | |
|---|-----|
| Rental Assistance | 0 |
| The Production of New Units | 141 |
| Rehab of Existing Units | 25 |
| Acquisition of Existing Units | 0 |
| Total | 166 |

Table 9 - One Year Goals for Affordable Housing by Support Type

Discussion

The City of Montgomery does not participate in Tenant Based Rental Assistance (TBRA) or other forms of direct rental assistance to families. As for supporting households through production of new units, the current goal is to produce at least 141 new affordable housing units. The City also has plans for a project to rehab up to twenty-five (25) existing single-family units during PY 2022. No households are expected to be supported through acquisition of existing units in any current City of Montgomery federal grant programs at the time of this writing.

AP-60 Public Housing – 91.220(h)

Introduction

The City will continue its efforts in partnership with its local Housing Authority to provide for safe, decent, affordable housing. CDBG funds were used in the previous Consolidated Plan for infrastructure needs at the newly redeveloped housing project - The Plaza at Centennial Hill (formerly Tulane Court) as well as Columbus Square (formerly Trenholm Court).

Actions planned during the next year to address the needs to public housing

During the PY 2020-2024 Consolidated Plan, the City of Montgomery will partner with the Montgomery Housing Authority (MHA) and provide CDBG funding for infrastructure development and/or improvements as needed to assist its population. The City provided CDBG funding for this project during its previous Consolidated Plan and will continue to aid in expanding the current affordable housing stock available to low income households while providing an opportunity to reduce MHA's waiting list.

In addition, planned construction of rental housing using HOME funds and CDBG funds (infrastructure for low-moderate income housing benefit) will provide for voucher participation from MHA.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The City, in coordination with the Montgomery Housing Authority (MHA), shall make information concerning affordable homeowner opportunities through the City's other entitlement programs such as the HOME program available to residents of public housing as well as coordinate with public housing staff any efforts to qualify residents for homeownership. MHA also operates the Housing Choice Voucher Program (HCV). The goal of the HCV Homeownership Program is to expand homeownership opportunities for families who are current HCV program recipients. Families must meet HUD and MHA program requirements for program participation. The objective of the HCV Homeownership Program is to assist first-time homebuyer's with monthly mortgage subsidy. This program allows the family to become invested in a wealth building opportunity.

If the PHA is designated as troubled, describe the manner in which financial assistance will be

provided or other assistance

This PHA is not designated as being a troubled entity.

Discussion

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AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The Mid-Alabama Coalition for the Homeless (MACH) is the Continuum of Care (CoC) for the City of Montgomery as well as for Montgomery County. MACH and the City of Montgomery's Community Development Division have been working together since 2004 to combat homelessness in the City. The initial partnership started with a business plan, "The Montgomery Area's Blueprint Toward Ending Chronic Homelessness." This Plan is over 10 years old and has been successful in reducing the number of homeless in the City while bringing in new resources to assist with this crisis. However, because of the onset of the COVID-19 pandemic, there is a need to revise and update this Plan with emphasis being placed on testing and vaccination of the homeless population. Until this new plan is designed and implemented, the City along with MACH will continue to follow the eight (8) recommendations: (1) Improve methods to prevent homelessness; (2) improve outreach services; (3) improve access to services; (4) expand permanent housing options; (5) improve efforts and methods for accurately counting homeless persons; (6) expand local, state, and national partnerships as well as peer to peer opportunities; (7) provide extensive training for local shelter providers; and, (8) explore additional funding opportunities to combat homelessness. Additionally, the Mayor has recently formed a Homelessness Taskforce Committee consisting of local homeless service providers to assist in making recommendations to the Mayor's Office as it relates to homeless issues in the City. The Committee is under the direction of the City's Policy Advisor and will develop policies to support efforts in assisting this population.

The City will continue to build and strengthen its relationship with the CoC and other shelter providers to include local, state, and national agencies in an effort to strengthen strategies and techniques to move homeless individuals and families from homelessness to permanent housing. The City will continue to develop a coordinated homeless response system that effectively incorporate emergency shelter, homeless prevention, rapid rehousing, transitional housing, street outreach and data collection (HMIS).

In addition to the Mayor's Homelessness Taskforce Committee, the Department of Community Development through the Community Development Division, has begun the process and task of developing a "Five-Year Plan to Combat Homelessness in the City of Montgomery". The purpose of this Plan is to develop a homelessness program infrastructure that will allow the City to move forward in addressing this important issue. The Plan, with assistance from a HUD Technical Assistance firm and Auburn University at Montgomery, will focus on the following goals to assist homeless individuals: (1) place individuals/families on the path to temporary and/or permanent housing; (2) provide opportunities for job training; (3) identify and unite local, state, and national resources to buy into project success; (4) conduct research and collect data for tracking project progress; (5) introduce new tools for data collection and tracking; (6) conduct frequent counts for data analysis and comparison; (7) develop real-time list of homeless individuals; (8) create an engagement and protocol process for case management and story collection; (9) develop fundraising program to support the

Initiative; (10) develop peer-to-peer relationship with other service providers; (11) create a homeless resource supply hub to support shelters and homeless individuals; (12) provide public education on homelessness; and (13) strengthen local shelter programs.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Although the City of Montgomery did not receive Emergency Solutions Grants (ESG) program funding during PY 2021, the City was able to support its homeless shelter providers with two (2) rounds of funding from the CARES Act (ESG-CV). The volume of CARES Act funds motivated the Department to not only support our homeless shelter providers, but also to plan for supporting the homeless community beyond COVID funding. With this in mind, the City will begin laying the groundwork to prepare a new homelessness strategy plan scheduled to launch late summer 2022 and will be designed to engage the community in a cooperative process resulting in an implementable plan to compliment HUD ESG funding. This Plan will also strengthen our Continuum of Care and HMIS partners. The City's one-year goals throughout the current Five-Year Consolidated Plan will focus on providing better services and opportunities to move homeless individuals and families to stable and permanent housing.

The City of Montgomery is a supportive partner of the Mid-Alabama Coalition for the Homeless' Continuum of Care (CoC). The CoC coordinated with homeless shelter providers and has developed a collaborative system to reach out to those experiencing homelessness. As the Continuum of Care, MACH is responsible for examining homelessness issues; devising methods to alleviate homelessness; providing services to the homeless and to those at risk of becoming homeless; and, conducting an annual survey of homeless individuals within its geographic boundaries. MACH accomplishes planning, coordination, proposed project prioritization, gaps analysis, and other HUD required tasks. As a result of MACH's planning and coordination activities, local agencies are eligible to receive HUD funding to serve homeless individuals from the geographical areas included in the MACH service area. Each year, approximately \$2 million in federal funding flows into the River Region through MACH's efforts.

MACH, along with HandsOn River Region, operates the 2-1-1 Connects system, a statewide network of regional call centers whose mission is to provide easy access to health and human services available throughout Alabama. The first call center was established in Montgomery in 2002 and the network has grown to provide services to all Alabama residents. The 2-1-1 Connects System provides information to residents (including the homeless) on utility assistance, food pantries, tax preparation assistance, rent payment assistance, and homeless shelters. Information from 2-1-1 is coordinated and systematically integrated into the Homeless Management Information System (HMIS) tracking individuals and families seeking homelessness assistance to provide quality assistance to clients. The City consistently supports MACH and HandsOn River Region with funds from the CDBG and ESG programs through Entitlement

funding.

Addressing the emergency shelter and transitional housing needs of homeless persons

Persons experiencing a housing crisis will continue to receive effective housing solutions through 2-1-1 Connects, the HMIS system, and/or the CoC network in general. These solutions will provide stable housing during a pandemic and post-pandemic environment that is affordable as well as healthy and safe. The transitional housing providers, emergency shelters, permanent supportive housing providers, and public housing providers have created a collaborative network system designed to meet the needs of their clients in a pandemic environment and will be able to use in a post-pandemic environment. The members of this organization coordinate their activities to ensure clients' needs are met when they are unable to provide certain other services to their clients.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The Continuum of Care (CoC) has developed and refined its discharge policy as it relates to helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are being discharged from publicly-funded institutions such as health care facilities, mental health facilities, correctional institutions, etc. The Continuum of Care Committee of the Mid-Alabama Coalition for the Homeless conducted a review of the appropriate discharge policies impacting the Montgomery area. The policy calls for a lead agency from the Coalition's membership to monitor and coordinate the discharge practices within the following institutional categories - Alabama Department of Corrections, Montgomery County Youth Facility, Alabama Department of Mental Health and Mental Retardation, Alabama Department of Human Resources, and a VA hospital. Because of the COVID-19 pandemic, special attention is given to ensure that transition from homelessness to permanent housing is conducted in a manner that is healthy and safe.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services,

employment, education, or youth needs.

The City's Montgomery Area Blue Print has served since 2004 as the guiding document and platform for addressing the issues of homelessness in Montgomery. As previously mentioned in this document, the Blue Print has been successful and under revision to include issues such as COVID-19. The City, in coordination with MACH, will develop a new homeless strategy plan that will encompass local homeless providers and previously engaged organization such as the Alabama Department of Corrections, the Montgomery County Youth Facility, Alabama Department of Mental Health and Mental Retardation, Alabama Department of Human Resources, VA hospital, etc. Each of these providers have their own method of discharge. The City's CoC has performed exceptionally well in monitoring the effectiveness of these agencies' discharge procedures in preventing homelessness by communicating and assessing persons who may become homeless prior to their release from institutional settings. One of the main objective of the City's new homeless strategy plan is to increase communication and coordination with all organizations and agencies providing or participating in homelessness activities in an effort to move homeless individuals to transitional and permanent housing in an expeditious manner.

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AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

The public sector can affect affordability in the housing market through policies on things such as zoning, building codes, infrastructure, and implemented planning and economic development activities. Affordability of housing is more indirectly affected by availability and costs of utilities; road construction and maintenance; property taxes; insurance; availability of transportation; and homeowner and renter knowledge of housing contractual practices.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City will strive to continue directing proactive financial and technical assistance to affordable housing occupants and developments, as well as encouraging non-profit community housing development organizations and/or for-profit developers that are experienced in providing quality affordable units. The City will also continue to maintain a current inventory of available vacant lots for the construction of affordable new infill housing.

The City continues to monitor relevant public policies to ensure against unintended effects that might tend to create or strengthen barriers to affordable housing; and, the City remains committed to the principle of non-discrimination against all protected classes, particularly with regard to the low-moderate income populations.

The City works to preserve its affordable housing stock through property maintenance codes enforcement, supported by City's Critical Repair ("emergency") Housing Rehabilitation Program grant, which helps eligible low-moderate income homeowners in addressing enforcement requirements, using CDBG funds. The City will also use gap financing provided through HUD's HOME Program to build new affordable rental housing on an annually funded basis, as well as to support Community Housing Development Organizations through operating cost assistance grants.

AP-85 Other Actions – 91.220(k)

Introduction:

The City of Montgomery, Alabama has identified a number of actions that will address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead-based Paint hazards, reduce the number of poverty-level families, develop institutional structure, and enhance coordination between public and private housing and social service agencies.

Actions planned to address obstacles to meeting underserved needs

As a part of the consolidated planning cycle for PY 2020-2024, the City of Montgomery will continue to evaluate underserved populations identified in its Analysis of Impediments to Fair Housing. To reduce the number of obstacles keeping the City of Montgomery from meeting the needs of the underserved populations in the community and help improve service delivery, the City's Community Development Division will assist with facilitating more city-wide collaborations in coordinating the work of social service organizations, eliminating duplication of efforts, spearheading community-wide solutions to local needs and disseminating information, news, and data that will assist all participant organizations a part of this collaborative effort.

Actions planned to foster and maintain affordable housing

The City of Montgomery will continue to invest HOME, HOME-ARP, and CDBG grant funds into programs that promote affordable housing and that preserve existing homeowner units, for LMI households. Although affordable rental housing is a priority focus, the City's goal is to promote and support programs that include opportunities for tenants to become successful homeowners. In addition, during this Consolidated Plan period, the City of Montgomery will be increasing the retention of affordable units in the local housing stock by making funds available to current LMI homeowners for critically needed repairs, who might not otherwise be able to afford to obtain them, thus preserving their housing asset. The City of Montgomery will also continue to seek collaborative partnerships with developers, non-profit, for-profit, and private entities to construct new affordable housing units, and/or to acquire and rehabilitate existing properties to make them available as affordable housing.

Actions planned to reduce lead-based paint hazards

Through its CDBG Homeowner Rehabilitation Program, the PJ takes every opportunity to offer assistance (where applicable) to assist tenants and homeowners to reduce existing hazards caused by lead based paint in houses built prior to January 1st, 1978. However, because the program is designed to make critical repairs only, current rehab program policy typically allows assistance only to properties that are exempt from requirements of the Lead Safe Housing Rule provided at 24 CFR 35.115. Any non-exempt units that might otherwise be assisted by the PJ with federal funds will be tested by qualified professionals for lead paint hazards, and certified contractors will be hired for remediation of lead

hazards.

The City of Montgomery will also continue to educate all recipients of HOME and CDBG funds on the hazards and dangers of lead based paint, and it requires its rehabilitation Subrecipients and/or contractors to provide HUD-approved documentation to homeowners, informing them on how to prevent lead from becoming a health concern in the home.

Actions planned to reduce the number of poverty-level families

In an effort to reduce the number of poverty-level families, the City of Montgomery plans to reduce the number of poverty-level residents by actively continuing to participate in a Continuum of Care, in which elected officials and City staff will ensure availability of services and programs offered, such as: transitional housing opportunities, homeless navigation services, and gender-oriented shelters. The City has consistently over the past years funded organizations with anti-poverty strategies in their programs to include crisis services, transitional services, and long-term support for homeless individuals.

Actions planned to develop institutional structure

The City of Montgomery will continue to be a strong partner with the Mid-Alabama Coalition for the Homeless (MACH) which serves as the Continuum of Care (CoC) for the City and the County. The City will continue to work with the CoC in a concerted effort to strengthen institutional structure established by the CoC.

Actions planned to enhance coordination between public and private housing and social service agencies

The City will continue to promote housing and service agency collaboration by supporting its two certified Community Housing Development Organizations in their corporate missions, for each of which, its Articles of Incorporation combines the provision social services with development of affordable housing. The PJ is currently working with the local Continuum of Care provider in the process of planning and developing its HOME-ARP Allocation Plan for implementing its recent award of ~\$3.3 Million in HOME-ARP dollars from HUD. The new program will target combined housing and social service needs to benefit certain specific qualifying populations, including those that are homeless or at greatest risk of becoming homeless.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

During PY 2022, the City of Montgomery will not have CDBG projects that include additional funding sources such as program income, Section 108 loan guarantees, etc. Although during the 2020-2024 Plan period the City does not have plans to use HOME funds for homeownership, refinancing existing properties, or owner-occupied rehab programs, this section will discuss the City's policies for such other forms of investments, including its adopted guidelines for resale and recapture; assurances of HOME program affordability; and refinance of existing debt secured by multifamily housing that is rehabilitated with HOME funds. For the ESG program, this section will discuss written standards for providing ESG assistance, coordinated assessment system with the local Continuum of Care, the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations, plan for reaching out to and consulting with homeless or formerly homeless individuals if the jurisdiction is unable to meet the homeless participation requirement, and performance standards for evaluating ESG. Information contained in this particular section is discussed further in their respective areas of the Action Plan.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

| | |
|--|----------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed | 0 |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. | 0 |
| 3. The amount of surplus funds from urban renewal settlements | 0 |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan | 0 |
| 5. The amount of income from float-funded activities | 0 |
| Total Program Income: | 0 |

Other CDBG Requirements

| | |
|---|---|
| 1. The amount of urgent need activities | 0 |
|---|---|

2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. 70.00%

**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(I)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Beyond eligible activities and forms of assistance identified at Section 92.205, the PJ may invest other resources as leverage for the investment of HOME funds. Some examples are as follows:

Eligible HOME Match contributions from non-federal resources would include donation of excess PJ-owned real property; waivers of building permit fees; donation or sale of property below market value for development as affordable housing; discounts obtained by HOME project developers through securing below-market interest rates on HOME project debt; and several other non-federally funded activities.

- The PJ requires all HOME funded affordable housing developers to invest funds from their own resources as their reasonable 'fair share' contribution to the cost of housing development and/or CHDO operations within the jurisdiction.
- Besides HOME funds, the PJ may, from time to time, invest available CDBG funds in eligible actions to supplement HOME development projects, such as infrastructure repairs or improvements, when made for the purpose of developing affordable housing.
- Lastly, the PJ is currently in the planning and development phase of its HOME-ARP Allocation Plan for PY 2021. The Plan, when fully approved, will invest up to approximately \$3.3 Million in eligible affordable housing and services for certain qualifying populations among citizens affected by homelessness.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City of Montgomery has elected rather than to pursue the Resale Provisions approach to preserving affordability of housing, to recapture the HOME assistance investment provided to the original homebuyer(s). Although the PJ does not offer any form of homebuyer program in its PY

2020-2024 Consolidated Plan, adopted policy of the PJ under a such a program remains as follows:

All City HOME assisted homebuyer transactions must include a direct Buyer Subsidy of at least \$1,000. To ensure this, either the sales price for each unit will be at least \$1,000 below appraised fair market value after construction, or other forms of HOME assistance of at least \$1,000 to the buyer must be included, i.e., down payment assistance, etc. Upon close of sale, the City Grants Administrator will prepare and execute a separate written HOME Housing Assistance agreement with the homebuyer that will, at a minimum, comply with the requirements at §92.504(c)(5) of the HOME rule. Every City of Montgomery HOME Program homebuyer assistance agreement will state clearly that the unit being purchased is subject to affordability Recapture provisions, and will include a copy of the policies and procedures for implementing the provisions as published in the City's current Consolidated Plan.

The HOME assistance agreement will employ publicly recorded mechanisms for enforcing the affordability period and Recapture provisions through a Recapture Mortgage Lien and Promissory Note; although, in some cases the City may use deed restrictions, covenants running with the land, or other similar mechanisms. If a homebuyer should cease to be in compliance with HOME requirements prior to expiration of the applicable Affordability Period, the City will recapture the entire direct HOME Subsidy invested in the property whenever possible, before the homebuyer receives a return. The amount recaptured by the City is limited to the amount of total net proceeds available from the sale of the property. In some cases, the net proceeds available at the time of sale may be insufficient to recapture the entire direct HOME subsidy provided to the homebuyer. In such case, since the HOME rule limits recapture to available net proceeds, the City will only recapture what is available from the net proceeds.

The form of the total amount of HOME direct Buyer Subsidy (i.e., the total of all Buyer Subsidy, Down Payment Assistance, and/or other funds subject to affordability restrictions) will be as a deferred forgivable loan secured by the Recapture Mortgage Lien and Note. The principal balance of the loan is reduced during the Affordability Period to a zero balance on a prorata basis per year over the length of the Affordability Period, as allowed at 24 CFR 92.254(a)(5)(ii)(A)(2).

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Guidelines for resale or recapture of HOME assistance for City of Montgomery acquisition of units for affordable housing are identical to those as stated above for HOME assistance to homebuyers. The buyer, whether homebuyer, developer, Subrecipient, CHDO, or other owner, as the case may be, receiving HOME funds for acquisition of units must sign a written HOME assistance agreement in which the above terms for Recapture provisions are clearly stated. Periods of affordability will be determined and incorporated into the agreement using a recorded Recapture Mortgage Lien and

Promissory Note according to the amount of HOME funds provided per unit by the PJ as follows:

- Under \$15,000: 5 years
 - From \$15,000 to \$40,000: 10 years
 - Above \$40,000: 15 years
4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City of Montgomery currently has no history or future plans related to using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds. Therefore, this activity is not a part of the City's Standard Operating Procedures & Policies manual. Should the PJ consider participating in the activity during the PY 2020-2024 Consolidated Plan period, it will create guidelines in accordance with the requirements of Section 92.206(b) and formally adopt them as part of the City's written policies and procedures.

Emergency Solutions Grant (ESG) Reference 91.220(I)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

Although the City of Montgomery will not receive any Emergency Solutions Grants (ESG) program funding during PY 2021, the City, with sufficient ESG funding from the CARES Act will be able to support its homeless shelter providers. Under normal circumstances while receiving a HUD allocation for the ESG Program, the following standards would apply -

The City will distribute ESG funds to local private nonprofit organizations for the following eligible ESG Program activities: 1. Street Outreach, 2. Emergency Shelter, 3. Homelessness Prevention, 4. Rapid Re-Housing Assistance, 5. Homeless Management Information System (HMIS). The total amount that may be used for street outreach and emergency shelter will not exceed 60% of the City's fiscal year grant or the amount of FY20 grant funds committed for homeless assistance activities, whichever is greater.

Grant Requirements for the ESG Program

All ESG grants will be administered in compliance with the regulations at 24 CFR Part 576- and/or- HEARTH regulations. Any private nonprofit organization within the local area is eligible to apply for funding through the City's ESG program for eligible activities. Funds will be obligated to recipients in accordance with HEARTH program deadlines. Programs funded will operate in accordance with the

HUD approved program year, beginning on May 1st. Any building for which emergency shelter grants are used must meet the following: **a. Rehabilitation:** (1). In cases other major rehabilitation or conversions, must be maintained as a shelter for the homeless for not less than a three year period; **b. Major Rehabilitation or Conversion:** (2). Must be maintained as a shelter for not less than a 10 year period if the rehabilitation costs exceeds 75 percent of the value of the building before rehabilitation; **c. Any building which is used for housing or shelter must meet HEARTH standards for suitability and habitability and** **d. If funds are used for the provision of services, maintenance or operating costs, the building must continue to be used as shelter for the duration of the grant agreement.**

Method of Distribution for the ESG Program

Funds made available to the City of Montgomery by the U.S. Department of Housing and Urban Development for the Emergency Shelter Grants Program will be administered by the **City of Montgomery, Department of Community Development, Community Development Division, 25 Washington Avenue, 4th Floor, Montgomery, AL 36104.** In accordance with 24 CFR Part 576.108, up to 7.5% of allocated funds may be set aside for program administration and eligible administrative costs. At the discretion of the Community Development Division, funds may, in whole or in part, be made available to fund emergency situations serving the homeless, including emergency winter shelter needs. Administration funds will be shared with local agencies to the extent that they participate in administering the program.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The City will consult with the Montgomery Area Coalition for the Homeless (MACH) in coordination with the COC to ensure integrating ESG assistance with programs targeted towards homeless through mainstream services and assistance programs. To ensure these activities are undertaken, the City with the MACH participation will (1)Determine how to allocate ESG funds; (2)Develop the performance standards for projects assisted by ESG funds; (3)Evaluate the outcomes of projects assisted by ESG funds; (4)Develop funding, policies, and procedures for the operation and administration of the Homeless Management Information System (HMIS); and (5)Provide at least one homeless or formerly homeless individual for participation on the board of directors, or other policy making entity.

In association with the Montgomery Area Coalition for the Homeless (MACH) through the Continuum of Care (COC) any private non-profit agency within the city limits of Montgomery is eligible to apply for funding. There is no restriction on the maximum amount an applicant may request. Funds will be granted to nonprofit organization only when the MACH certifies that it approves the proposed project, the applying agency is a member of the COC, and the applying agency participates in HMIS. To effectively ensure the ESG reaches out to the homeless population, the City in coordination with MACH and the COC will coordinate and integrate other targeted

homeless services. This community-wide approach will include but not be limited to the following: (1) Shelter plus Care Programs; (2) Supportive Housing Programs; (3) Veterans Affairs Supportive Housing (HUD-VASH); (4) Transitional Housing Assistance for Victims of Domestic Violence, Dating Violence, and Stalking; and (5) Emergency Food and Shelter Program.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

Funds will be distributed utilizing a common application and cycle. A competitive application process will be in place to allow each agency throughout the City to seek ESG funds to operate. This application will ensure all agencies provide the required documentation allowing the City to select the best applicant for funding. The Community Development Division in coordination with MACH will form an application review board to screen applicants. Additional review board members may include a current/formerly homeless person. All proposals will be evaluated by the review board. The City's Community Development Division will coordinate their selections with the Montgomery City Council, with final approval from the Mayor of Montgomery.

At the discretion of the City, funding may not be awarded to an ESG recipient who has a serious, outstanding audit or monitoring finding involving the potential for significant monetary restitution, non-responsiveness, or non-responsible performance on any previous funded ESG grant.

Applications will be rated on the following criteria: (1) Number of clients served; (2) Population served; (3) Services provided; (4) Location of shelter; (5) Consideration will be given to program effectiveness in meeting adopted performance measures as outlined in the application packet; (6) Consideration will be given to those agencies which have been effective in their discharge of clients/consumers; (7) Capacity; (8) Other funding sources; (9) Past performance; (10) Most current certified independent audit; and (11) Assurances, certifications, current board roster, and support documentation. Following the rating and review process, the Community Development Office will provide recommended funding selections to the Mayor of Montgomery, who will then authorize funding awards.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The City of Montgomery meets the homeless participation requirement found in 24 CFR 576.405(a) through the Mid-Alabama Coalition for the Homeless (MACH)'s Continuum of Care. Several

organizations representing the homeless were contacted for input during the planning process and the public meeting was advertised and homeless persons were informed of the meeting at the time of their housing and social services were provided. Homeless participation will continue to be secured through consultation with MACH.

5. Describe performance standards for evaluating ESG.

The City of Montgomery does not prioritize assistance through the ESG program. Clients are served as received. Per 24 CFR 576.401, ESG sub-recipients must conduct an initial evaluation to determine each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. All ESG sub-recipients will follow federal documentation guidelines to establish the client's status as homeless or at-risk of homeless and their income eligibility. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under §576.400(d).

The City of Montgomery is currently working with the Mid-Alabama Coalition for the Homeless (MACH)'s Continuum of Care (CoC) to develop common intake and assessment tools and protocols to be used by all agencies that receive ESG, CoC and other homeless program funding from the city and within the Continuum. The tools and protocols will create consistency in client intake and assessment and provide basis for appropriate agency referral and to develop targeting and prioritization protocols.

ESG sub-recipients must re-evaluate program participant's eligibility and the types and amounts of assistance the participant needs; 1. Not less than once every 3 months for participants who are receiving homelessness prevention assistance, and 2. Not less than once annually for participants who are receiving rapid re-housing assistance. Re-evaluation of program participants may be conducted more frequently than required by 24 CFR 576.401 and may be incorporated into the case management process which must occur not less than monthly for homeless prevention and rapid re-housing participants – See 24 CFR 576.401(e) (i). Regardless of which timeframe is used, re-evaluations, must at minimum, establish that:

1. The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and the program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance. To determine if an individual or family is income eligible, the sub-recipient must examine an individual or family's annual income to ensure that it does not exceed the most current HUD income limits applicable to the City of Montgomery. Note: Annual income must be below 30% at the time of the initial evaluation. When the program participant's income or other circumstances change, such as change in household composition, that affects the program participant's need for assistance under ESG, the sub-recipient must then re-evaluate the program participant's eligibility and the amount and types of assistance the program participant needs.