

NORTHERN MARIANAS HOUSING CORPORATION

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Notice for Public Comment

THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE REPORT

July 3, 2020

The Northern Marianas Housing Corporation (NMHC) would like to inform the general public that the Analysis of Impediments (AI) to Fair Housing Choice Draft Report is available for public review.

The Analysis of Impediments will be available for public review beginning July 3, 2020 to July 15, 2020. Due to protocols to mitigate the spread of CoVid19, the Analysis of Impediments will be available for review on NMHC's website at www.nmhcgov.net (tab titled "CDBG"), Office of the Governor's website at www.gov.mp, and on NMHC's Facebook page.

A Virtual Public Hearing on the Al report will be held via Zoom teleconference and Facebook Live on July 10, 2020 at 10:00a.m. The meeting ID and password is posted on the NMHC website.

Written comments on the Al Report should be submitted no later than Wednesday, July 15, 2020, 4:30 p.m. to NMHC's offices in Saipan, Tinian, or Rota. You may also submit your comments via email at nmhc@nmhc.gov.mp or orally at the virtual hearing scheduled above.

If you may have any questions or concerns, please feel free to contact Ms. Tricia Tenorio, Planner at (670)234-6866/ or mobile (670)989-9448.

NMHC will make necessary arrangements for persons with disabilities. If you should require any special accommodations please contact our office (48) hours in advance.

/s/ Jesse S. Palacios Corporate Director

COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

Analysis of Impediments to Fair Housing Choice

2020 COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE:



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Draft for Internal Review June 18, 2020

Has Your Right to Fair Housing Been Violated?

If you feel you have experienced discrimination in the housing industry, please contact:

The United States Department of Housing and Urban Development

Office of Fair Housing and Equal Opportunity

Department of Housing and Urban Development 451 Seventh Street SW, Room 5204 Washington, DC 20410-2000

Telephone: (202) 708-1112 **Toll Free:** (800) 669-9777

Web Site: http://www.HUD.gov/offices/fheo/online-complaint.cfm

The Northern Marianas Housing Corporation

Family Self-Sufficiency (FSS) Program Coordinator

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Housing Needs Assessment Survey Data: Tinian	Error! Bookmark not defined.

SECTION I. EXECUTIVE SUMMARY

Overview

Title VIII of the 1968 Civil Rights Act, also known as the Fair Housing Act, protects people from discrimination based on race, color, national origin, religion, sex, familial status, and disability when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing related activities. The Act, and subsequent laws reaffirming its principles, seeks to overcome the legacy of segregation, unequal treatment, and historic lack of access to housing opportunity. There are several statutes, regulations, and executive orders that apply to fair housing, including the Fair Housing Act, the Housing Amendments Act, and the Americans with Disabilities Act.1

Affirmatively furthering fair housing is defined in the Fair Housing Act as taking "meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics". Specifically, affirmatively furthering fair housing requires that recipients of federal housing and urban development funds take meaningful actions to address housing disparities, including replacing segregated living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.³ Furthering fair housing can involve developing affordable housing, removing barriers to affordable housing development in high opportunity areas, investing in neighborhood revitalization, preserving and rehabilitating existing affordable housing units, improving housing access in areas of concentrated poverty, and improving community assets.

Assessing Fair Housing

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(e)(5) of the Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.4

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH).

In July of 2015, HUD released a new AFFH rule which provided a format, a review process, and content requirements for the newly named "Assessment of Fair Housing", or AFH.⁵ The assessment would now include an evaluation of equity, the distribution of community assets, and access to

¹ https://www.hud.gov/program offices/fair housing equal opp/fair housing and related law

² § 5.152 Affirmatively Furthering Fair Housing

³ § 5.152 Affirmatively Furthering Fair Housing

^{4 42} U.S.C.3601 et seg.

⁵ 80 FR 42271. https://www.federalregister.gov/documents/2015/07/16/2015-17032/affirmatively-furthering-fair-housing

opportunity within the community, particularly as it relates to concentrations of poverty among minority racial and ethnic populations. Areas of opportunity are physical places within communities that provide things one needs to thrive, including quality employment, high performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes.

The AFH includes measures of segregation and integration, while also providing some historical context about how such concentrations became part of the community's legacy. Together, these considerations were intended to better inform public investment decisions that would lead to amelioration or elimination of segregation, enhance access to opportunity, promote equity, and hence, housing choice. Equitable development requires thinking about equity impacts at the front end, prior to the investment occurring. That thinking involves analysis of economic, demographic, and market data to evaluate current issues for citizens who may have previously been marginalized from the community planning process. All this would be completed by using an on-line Assessment Tool.

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020.⁶ Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line Assessment Tool for local government program participants; and, the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI; and, encouraged jurisdictions to use them, if so desired.

Hence, the AI process involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, housing transactions, locations of public housing authorities, areas having racial and ethnic concentrations of poverty and access to opportunity. The development of an AI also includes public input, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified fair housing issues and impediments.

In accordance with the applicable statutes and regulations governing the Consolidated Plan, the Northern Marianas Housing Corporation certifies that they will affirmatively further fair housing, by taking appropriate actions to overcome the effects of any impediments identified in the Analysis of Impediments to Fair Housing Choice and maintaining records that reflect the analysis and actions taken in this regard.

Socio-Economic Context

The population in the Commonwealth of the Northern Mariana Islands decreased between 2010 and 2017, to 52,264. However, the CMNI is seeing a growth in the older population, which increased by 69.5 percent during that time period. In 2017, an estimated 28,240 persons were considered to Asian, including 21,537 Filipino and 3,829 Chinese. Some 23,267 persons were Pacific Islander, including 18,564 Chamorro and Carolinian. The most common languages spoken include Pacific Islander and Asian Languages. Some 41,069 persons speak both English and another language, while 23,786 speak an Asian language. Some 17,005 persons speak Pacific Islander languages, and 10,658 speak English.

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^{6 83} FR 683 (January 5, 2018)

In 2018, unemployment in the Commonwealth of the Northern Mariana Islands was at 10.5 percent. An estimated 74.7 percent of males and 58.8 percent of females participate in the labor force. The most common employment industry was Arts, Entertainment and Food Services in 2017, accounting for 31.7 percent of employment. This had grown by 41.7 percent since 2010. The next most common industry was Public Administration, accounting for 13.1 percent in 2017, and growing by 33.4 percent since 2010. Earnings in the Commonwealth as a whole were most likely between \$10,000 and \$15,000, representing 13,502 incomes. The next most common were earning less than \$10,000, for 3,252 persons. This trend was also true in Saipan itself, as well as Tinian and Rota.

There were a total of 16,707 households in the CNMI in 2017, with 7,669 of those living in a one-family detached house. In 2017, 9,136 households rent their homes with cash, while only 1,101 owned their home with a mortgage or loan. In addition, another 3,103 households owned their home free and clear and 3,366 households occupied their homes without payment. Households with 2 bedrooms were most common in the CNMI in 2017, with 6,134 households living in a 2-bedroom home. Housing costs varied throughout the Commonwealth. Rents were highest in Saipan's District 5 at \$251-\$300 each month. This was followed by \$201-\$250 in Districts 1 and 3. In Tinian, the median rent was \$100-\$130 and was \$100 in Rota. More than a quarter of housing units in Districts 2 and 4 were worth less than \$50,000, as seen in Map IV.11. Meanwhile, more than 35.1 percent of housing units in Rota and Tinian were valued between \$50,000 and \$100,000 in 2017. In District 5 in Saipan, 19.8 to 30.2 percent of housing units were valued between \$150,000 and \$300,000.

Overview of Findings

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, Commonwealth of the Northern Mariana Islands has identified a series of fair housing issues/impediments, and other contributing factors that contribute to the creation or persistence of those issues.

Table I.1, provides a list of the contributing factors that have been identified as causing these fair housing issues/impediments and prioritizes them according to the following criteria:

- 1. High: Factors that have a direct and substantial impact on fair housing choice.
- 2. Medium: Factors that have a less direct impact on fair housing choice, or that the Northern Marianas Housing Corporation has limited authority to mandate change.
- 3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that the Northern Marianas Housing Corporation has limited capacity to address.

Table I.1 Contributing Factors Commonwealth of the Northern Mariana Islands						
Contributing Factors	Priority	Justification				
Insufficient affordable housing in a range of unit sizes	High	Some 20.3 percent of households had cost burdens in 2010. This is more significant for owner households with a mortgage, of which 31.2 percent have cost burdens. This signifies a lack of housing options that are affordable to a large proportion of the population.				
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the need of the growing elderly and disabled population, particularly as the population continues to age. The elderly population grew by 69.5 percent between 2010 and 2017, representing the fastest growing age group in the CNMI. In 2010, an estimated 57.4 percent of persons aged 75 and older had a disability. Disabilities were found at a greater rate on the Island of Rota, as seen in Maps IV.19 through IV.24.				
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.				
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education. This is also demonstrated in the lack of fair housing complaints in the CNMI.				
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit needed to access mortgages.				

FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND PROPOSED ACHIEVEMENTS

Table I.2 summarizes the fair housing issues/impediments and contributing factors, including metrics, milestones, and a timeframe for achievements.

Fair Housing Goal	Impediments to Fair Housing Choice/ Contributing Factors	Recommended Actions
Promote affordable homeownership and rental opportunities	Insufficient affordable housing in a range of unit sizes	Continue to promote homeownership and affordable rental opportunities in high opportunity areas with the use of CDBG and HOME funds. Over the next five (5) years: 260 rental units added 10 homeowner units added 100 rental units rehabilitated 10 homeowner housing units rehabilitated Record activities annually.
Promote community and service provider knowledge of ADA laws	Insufficient accessible affordable housing	Increase outreach and education for housing providers in the state, focusing on legal requirements concerning reasonable accommodation, in coordination with local disability advocate organizations. Record activities annually.
Increase outreach and education for housing providers in the Commonwealth	Lack of fair housing infrastructure Insufficient fair housing education Insufficient understanding of credit	Continue to conduct fair housing outreach and education targeting rental tenants, providing an overview of fair housing laws and examples of discrimination that housing consumers may encounter in the rental housing market. Continue to publicize the responsibilities of the Commonwealth's fair housing officer, a role currently filled by the Family Self-Sufficiency Program Coordinator of the Northern Marianas Housing Corporation, in print and online media, including the Housing Corporation website. Continue to promote education through website and online materials. Continue to fund homeownership counseling using HOME funds: 30 over five (5) years. Record activities annually.

SECTION II. COMMUNITY PARTICIPATION PROCESS

The following section describes the community participation process undertaken for the 2020 Commonwealth of the Northern Mariana Islands Analysis of Impediments to Fair Housing Choice.

A. OVERVIEW

The outreach process included the Fair Housing Survey, a Fair Housing Forum, and a public review meeting.

The Fair Housing Survey was distributed as an internet outreach survey. As of the date of this document, 233 responses have been received.

The Draft for Public Review AI was made available for a 30-day public input period was initiated.

A public hearing will be held, during the public review period in order to gather feedback and input on the draft Analysis of Impediment. After the close of the public review period and inspection of comments received, the final report will be made available to the public.

B. THE 2019 FAIR HOUSING SURVEY

The purpose of the survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many individuals and organizations throughout the Commonwealth of the Northern Mariana Islands were invited to participate. At the date of this document, some 233 responses were received. A complete set of survey responses can be found in **Section IV.I Fair Housing Survey Results**.

C. THE FINAL PUBLIC REVIEW PROCESS

A 30-day public review process was held July 1, 2020 through August 1, 2020. It included with a public review meeting being held during this time. Comments from this meeting will be summarized below.

SECTION III. ASSESSMENT OF PAST GOALS AND ACTIONS

An Analysis of Impediments to Fair Housing Choice for the Commonwealth of the Northern Mariana Islands was last completed in 2015. The conclusions drawn from this report are outlined in the following narrative.

A. PAST IMPEDIMENTS AND ACTIONS

The conclusions of the 2015 Analysis of Impediments are included below:

IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

Private Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: People who are not of Northern Marianas Descent (NMD), and who are subject to legal restrictions on their ability to own land, tend to be concentrated in areas with high shares of rental housing. This impediment was identified through review of Article XII of the Commonwealth Constitution, as well as through geographic analyses of the Commonwealth population and housing stock.

- Action 1.1: Seek avenues to promote a greater balance of owner- and renter-occupied housing throughout the Commonwealth, including policies to encourage the development of rental housing in areas currently dominated by owner-occupied housing.
- Measurable Objective 1.1: The identification of methods to promote a greater balance of renter- and owner-occupied housing.
- Action 1.2: In future housing development, promote the development of multi-story owner-occupied condominium units that allow for ownership by non-NMD residents in areas with high concentrations of single-family, owner-occupied housing.
- Measurable Objective 1.2: Measures taken to promote multi-story condominium development in areas with high concentrations of owner-occupied housing.

Impediment 2: Lack of fair housing complaint activity. This impediment was identified in correspondence with representatives from HUD and the Northern Marianas Housing Corporation, as well as in the lack of housing complaints that either agency has received from Commonwealth residents.

- Action 2.1: Conduct outreach and education activities to promote awareness of fair housing laws and the legal remedies available to those who believe that they have experienced discrimination in the housing market.
- Measurable Objective 2.1: The number of outreach and education activities conducted and the number of participants in those activities.

Impediment 3: Need to create legal avenues available to Commonwealth residents who believe that they have experienced housing discrimination. This impediment was identified in the lack of fair housing complaint data and through review of the Northern Marianas fair housing infrastructure.

- Action 1.1: Explore possibilities for public-private partnerships, with local legal system, to provide fair housing services including outreach, education, and enforcement.
- Measurable Objective 1.1: The identification of potential partners, an assessment of the types of services that these partnerships could offer, and the establishment of any partnerships focusing on fair housing issues.

Public Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: Need to strengthen the local fair housing infrastructure. This impediment was identified through review of the fair housing agencies and organizations serving commonwealth residents, contact with the U.S. Department of Housing and Urban Development, and results of the 2015 Fair Housing Survey.

- Action 1.1: Publicize the responsibilities of the Commonwealth's fair housing officer, a role currently filled by the Family Self-Sufficiency Program Coordinator of the Northern Marianas Housing Corporation, in print and online media, including the Housing Corporation website.
- Measurable Objective 1.1: Publication materials relating to the fair housing officer, and the number and type of media outlets in which the position is publicized.
- Action 1.2: Task the fair housing officer with conducting or promoting fair housing outreach, education, and training activities in the Commonwealth.
- Measurable Objective 1.2: The number of outreach and education activities conducted by the fair housing officer, the number of participants in those activities, and the level of resources dedicated to fair housing outreach and education.

Impediment 2: Lack of knowledge of fair housing rights and obligations on the part of housing providers and consumers. This impediment was identified through review of responses to the 2015 Fair Housing Survey.

- Action 2.1: Conduct fair housing outreach and education targeting rental tenants, providing an overview of fair housing laws and examples of discrimination that housing consumers may encounter in the rental housing market.
- Measurable Objective 2.1: The number of fair housing outreach and education activities conducted, and the number of participants in those activities.
- Action 2.2: Include a discussion of the Commonwealth Fair Housing Act on the Housing Corporation's Fair Housing webpage, and update hyperlinks to fair housing complaint forms.
- Measurable Objective 2.2: The inclusion of additional narrative on the Housing Corporation's Fair Housing webpage and updated hyperlinks.

Impediment 3: Lack of Northern Marianas Housing Corporation certification as "substantially equivalent" for the purposes of the Fair Housing Assistance Program (FHAP). This impediment was identified through review of the Northern Marianas fair housing infrastructure.

Action 3.1: In year three of the Five-Year Al Action Plan, direct the Fair Housing Officer to compile data concerning fair housing complaint processing and enforcement activities that the Office has conducted in the first two years of the Action Plan period and present those data to HUD as part of an application for substantially equivalent status.

Measurable Objective 3.1: Data gathered for submission to HUD, submittal of the data, and HUD's response.

FAIR HOUSING ACTIVITIES

The following actions have been described in the 2017 Consolidated Annual Performance and Evaluation Report (CAPER):

NMHC has worked proactively and collaboratively with the Office of Vocational Rehabilitation and Council on Developmental Disabilities to provide accommodations for those who are visually impaired and for those who lack transportation. NMHC is also an official member of the Mental Health Planning Council, of which the said agencies are members of. NMHC has established discussions and continues to follow up with the Commonwealth of Transit Authority (COTA) about the expansion of their vehicle routing services, most especially to individuals with disabilities, who are also being served in the HUD-assisted programs. As with limited funding for housing programs, NMHC will continue to explore funding opportunities for housing assistance, as the demand for housing is greater than ever (especially after the disaster caused by Typhoon Soudelor). Karidat Social Services, NMHC's ESG Subgrantee, is the only other agency which provides monthly housing vouchers through a federal program, and continues to administer the HESG Program. As mentioned above, NMHC has no control over the CNMI's minimum wage.

SECTION IV. FAIR HOUSING ANALYSIS

This section presents demographic, economic, and housing information collected from the Census Bureau. Data were used to analyze a broad range of socio-economic characteristics, including population growth, race, ethnicity, disability, employment, poverty, and housing trends. The information presented in this section illustrates the underlying conditions that shape housing market behavior and housing choice in the Northern Mariana Islands. For clarity the narrative and tables included in this section largely focus on trends in the Commonwealth as a whole. However, some of the data is presented by District when available.

Lead Agency and Service Area

The Northern Marianas Housing Corporation is the lead agency undertaking this Analysis of Impediments to Fair Housing Choice. Map IV.1, below, shows the geographic area for this study, the Northern Mariana Islands Study Area.

Map IV.1

Study Area
Commonwealth of the Northern Mariana Islands

Legend
The Northern Mariana Islands Study Area
2017 Population of the Commonwealth of the Northern Mariana Islands = 52,284

CNMI Districts 1 2 3 3 4 5 6 6 7 7

A. SOCIO-ECONOMIC CONTEXT

As part of the essential review of the background context of the markets which housing choices are made in the Northern Mariana Islands, detailed population and demographic data are included to describe the residents of these areas. These data summarize the characteristics of the total population for the Commonwealth, as well as data by District or Island when available. This data is primarily drawn from the Commonwealth's Labor Force survey that was conducted in 2017. This is also supplemented with 2010 Census data when necessary.

DEMOGRAPHICS

POPULATION BY DISTRICT

Table IV.2 shows the population by District. In Saipan, there were a total of 47,564 residents in five districts. District 3 had the largest population of 15,218, sollowed by Dsitrct 1 with a population of 14,416. On the Island of Tinian, the population was 2,626. There were 2,072 on Rota.

POPULATION BY AGE

The population of the Northern Mariana Islands stood at 69,221 in 2000, as shown in Table IV.2 below. In 2017, a majority of the population was aged 25 to 54 years, with residents aged 35 to 54 accounting for the largest share of the population, at 33.4

Table IV.1					
Populati	Population by District				
Northern	Mariana Islands				
2017	⁷ LF Survey				
District	General Population				
Saipan Dist. 1 14,416					
Saipan Dist. 2 6,566					
Saipan Dist. 3	15,218				
Saipan Dist. 4	3,892				
Saipan Dist. 5	7,472				
Tinian 2,626					
Rota	2,072				
CNMI Total	52,262				

percent. The population as a whole fell by 3.0 percent over 2010 to 2017 time period due to a sharp decline in the number of residents aged 25 to 34, and children aged less than five years with a decrease of 25.8 percent and 24.8 percent, respectively. As a result, the composition of the population by age shifted markedly over the decade as the share of residents aged 5 to 19 rose about 28.7 percent and the share of residents aged 55 to 64 grew by 11.1 percent.

Table IV.2 Population by Age Northern Mariana Islands 2000 & 2010 Census & 2017 LF Survey									
A == 0	2000 C	ensus	2010 C	ensus	2017 LF	Survey	% Change		
Age	Population	% of Total	Population	% of Total	Population	% of Total	10–17		
Under 5	5,792	8.4%	4,827	9.0%	3,632	6.9%	-24.8%		
5 to 19	13,740	19.8%	13,784	25.6%	14,977	28.7%	8.7%		
20 to 24	7,566	10.9%	2,670	5.0%	2,608	5.0%	-2.3%		
25 to 34	20,181	29.2%	6,925	12.9%	5,137	9.8%	-25.8%		
35 to 54	18,859	27.2%	19,955	37.0%	17,465	33.4%	-12.5%		
55 to 64	2,036	2.9%	4,156	7.7%	5,790	11.1%	39.3%		
65 or Older	1,047	1.5%	1,566	2.9%	2,655	5.1%	69.5%		
Total	69,221	100.0%	53,883	100.0%	52,264	100.0%	-3.0%		

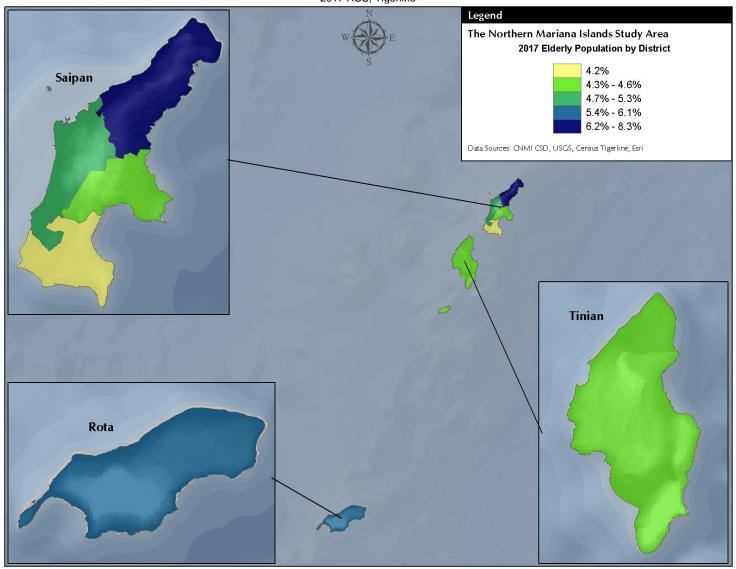
The elderly population, or those over age 65, is shown in Table IV.3, below. This age groups saw the greatest growth between 2010 and 2017, by 69.5 percent. Those aged 65 to 69 grew at the highest rate, at 99.7 percent during that time. As the population is aging, the needs for housing and services may change to accommodate these elderly households.

Table IV.3 Elderly Population by Age Northern Mariana Islands 2010 Census & 2017 LF Survey							
Age	2010 C	ensus	2017 LF	Survey	% Change		
Age	Population	% of Total	Population	% of Total	10–17		
65 to 69 years	699	44.6%	1,396	52.6%	99.7%		
70 to 74 years	440	28.1%	716	27.0%	62.7%		
75 to 79 years	75 to 79 years 250 16.0% 328 12.4% 31.2						
80 years and over	177	11.3%	215	8.1%	21.5%		
Total	1,566	100.0%	2,655	100.0%	69.5%		

The elderly population is shown in Map IV.2. Within Saipan, the highest concentration of elderly households was in District 4, followed by the Island of Rota, and then Districts 2 and 3.

Map IV.2

Elderly Population
Commonwealth of the Northern Mariana Islands
2017 ACS, Tigerline



POPULATION BY RACE AND ETHNICITY

Table IV.4 shows the racial and ethnic demographics in the Northern Mariana Islands Commonwealth. An estimated 28,240 persons were considered to Asian, including 21,537 Filipino and 3,829 Chinese. Some 23,267 persons were Pacific Islander, including 18,564 Chamorro and Carolinian.

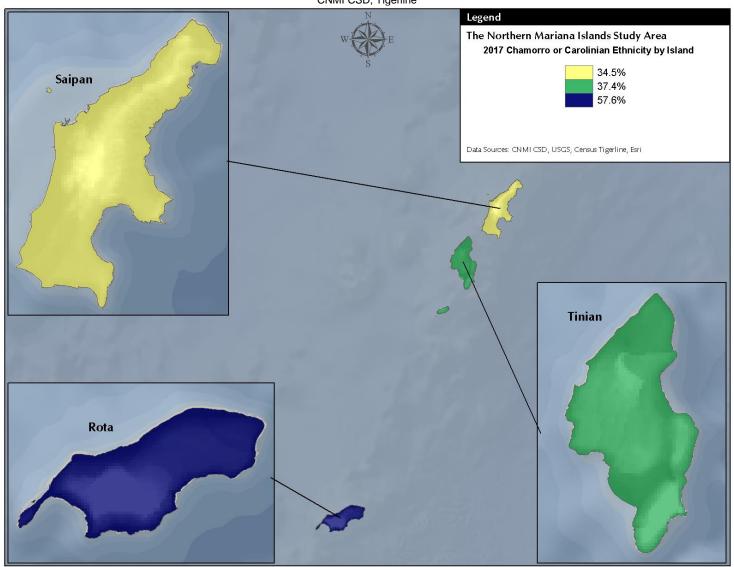
Table IV.4 Population by Ethnicity Northern Mariana Islands 2017 LF Survey						
Ethnicity	General Population					
Pacific Islander	23,267					
Chamorro and Carolinian	18,564					
Micronesian	4,503					
Other Pac Islander	200					
Caucasian	574					
Asian	28,240					
Chinese	3,829					
Japanese	435					
Korean	757					
Filipino	21,537					
Other Asian	1,683					
Other Single	182					

Maps IV.3 through IV.7 show the various ethnicities in the Marianas Islands. Map IV.3 shows the percentage of persons of Chamorro or Carolinian Ethnicity. There was the highest concentration on the Island of Rota, at 57.6 percent, followed by 37.4 percent on Tinian, and 32.5 percent on Saipan.

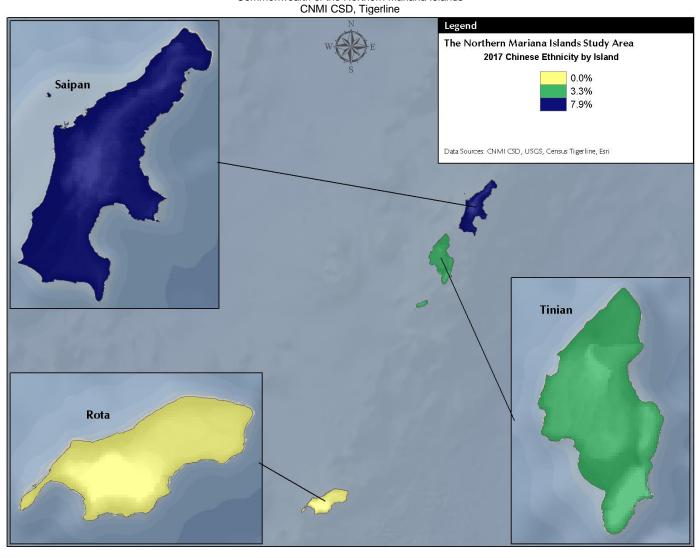
Map IV.4 shows the concentration of Chinese persons in the CNMI. Saipan had the highest concentration of ethnically Chinese persons, at 7.9 percent, followed by Tinian at 3.3 percent. Map IV.5 shows the Filipino population in 2017. The highest concentration of Filipino persons was found on Tinian at 46.9 percent, followed by Saipan at 41.3 percent, and Rota at 31.8 percent.

Map IV.6 shows the Micronesian population. The highest Micronesian population was in Saipan, at 9.2 percent. This was followed by Tinian at 2.4 percent and Rota at 2.1 percent. Map IV.7 shows the population of "other" Asian ethnicities in 2017. Tinian had the highest concentration of "other" Asian ethnicities, at 7.8 percent. This was followed by Rota at 6.0 percent and Saipan at 2.8 percent.

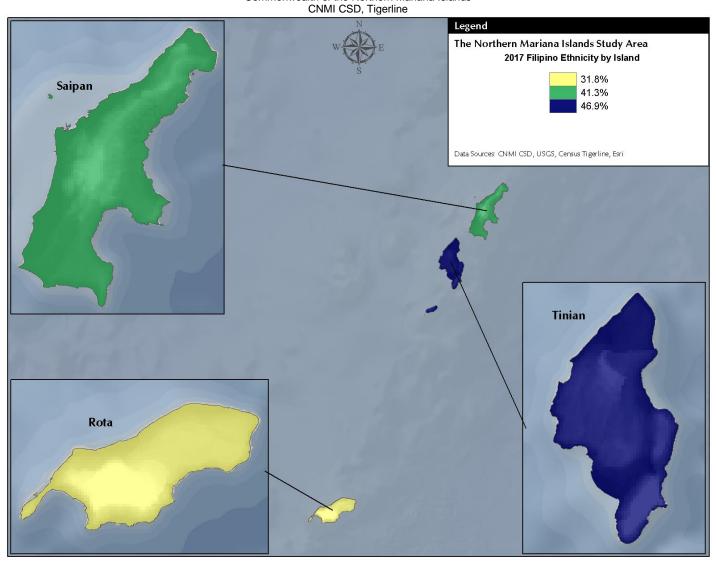
Map IV.3 2017 Chamorro and Carolinian Ethnicity by Island
Commonwealth of the Northern Mariana Islands
CNMI CSD, Tigerline



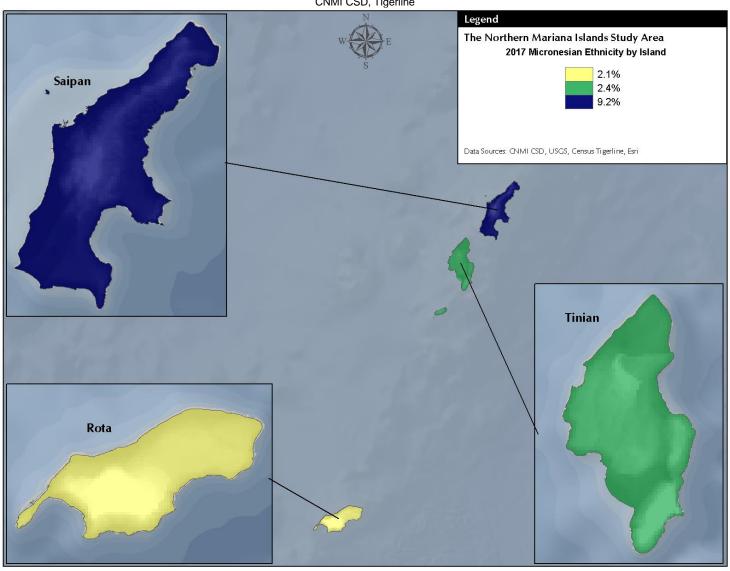
Map IV.4
2017 Chinese Ethnicity by Island
Commonwealth of the Northern Mariana Islands



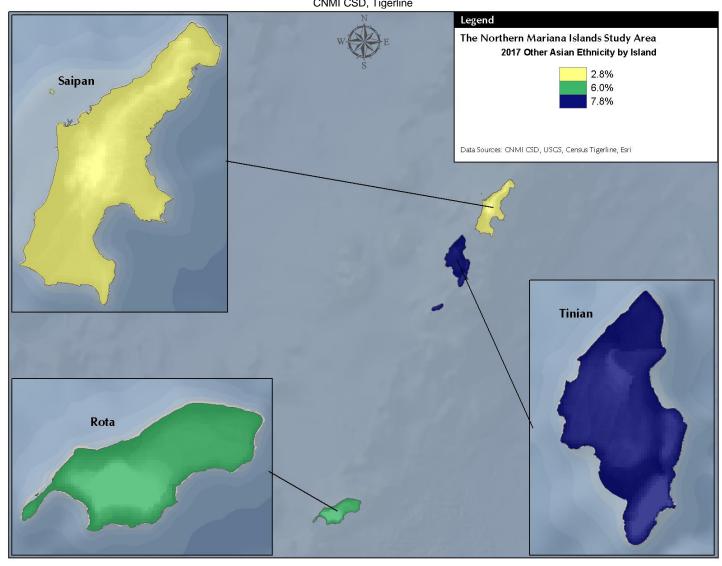
Map IV.5
2017 Filipino Ethnicity by Island
Commonwealth of the Northern Mariana Islands



Map IV.6
2017 Micronesian Ethnicity by Island
Commonwealth of the Northern Mariana Islands
CNMI CSD, Tigerline



Map IV.7
2017 "Other" Asian Ethnicity by Island
Commonwealth of the Northern Mariana Islands
CNMI CSD, Tigerline



The most common languages spoken include Pacific Islander and Asian Languages. Some 41,069 persons peak both English and another language, while 23,786 speak an Asian language. Some 17,005 persons speak Pacific Islander languages, and 10,658 speak English.

Table IV.5 Population by Language Northern Mariana Islands 2017 LF Survey					
Language Spoken	General Population				
English	10,658				
English and Another Language	41,069				
Pac. Islands Languages	17,005				
Asian Languages	23,786				
Other Languages	278				

SUMMARY

The population in the Commonwealth of the Northern Mariana Islands decreased between 2010 and 2017, to 52,264. However, the CMNI is seeing a growth in the older population, which increased by 69.5 percent during that time period. In 2017, an estimated 28,240 persons were considered to Asian, including 21,537 Filipino and 3,829 Chinese. Some 23,267 persons were Pacific Islander, including 18,564 Chamorro and Carolinian. The most common languages spoken include Pacific Islander and Asian Languages. Some 41,069 persons peak both English and another language, while 23,786 speak an Asian language. Some 17,005 persons speak Pacific Islander languages, and 10,658 speak English.

ECONOMICS

The following section describes the economic context for the Commonwealth of the Northern Mariana Islands. The data presented here is from the 2017 Labor Force Survey.

Labor Force

Table IV.6 shows the labor force of the Commonwealth of the Northern Marianas Islands (CNMI) by District. The total population of the CNMI is 52,262 people, the potential labor force (persons 16+ years old) is 37,418 people, and the actual labor force is 25,106 persons. Overall, the labor force participation rate for the CNMI is 67.1 percent. The labor force participation rate is highest in Saipan District 2, at 72.7 percent, and lowest in Saipan District 5, at 61.6 percent. The unemployment rate also varies by District, with the lowest rate in Tinian at 6.8 percent, and the highest rate of unemployment in Saipan District 2, at 12.8 percent.

Table IV.6 Labor Force Participation by District Northern Mariana Islands 2017 LF Survey								
District	Potential Labor General Force Labor Force Employed Unemployed Not In Labor Unemployment Population Population Population Population Population (persons 16+ Rate years)							Labor Force Participation Rate
Saipan Dist. 1	14,416	10,209	6,706	5,980	726	3,503	10.8 %	65.7 %
Saipan Dist. 2	6,566	4,426	3,217	2,807	410	1,210	12.8 %	72.7 %
Saipan Dist. 3	15,218	10,961	7,697	7,052	645	3,264	8.4 %	70.2 %
Saipan Dist. 4	3,892	2,714	1,676	1,507	169	1,038	10.1 %	61.7 %
Saipan Dist. 5	7,472	5,690	3,508	2,992	515	2,182	14.7 %	61.6 %
Tinian	2,626	1,874	1,218	1,135	83	656	6.8 %	65.0 %
Rota	2,072	1,544	1,084	986	98	461	9.0 %	70.2 %
CNMI Total	52,262	37,418	25,106	22,459	2,646	12,314	10.5%	67.1%

The labor force population is made up of 14,751 men and 10,534 women. The labor force participation rate varies by gender, with men at 75.7 percent and women at 58.8 percent. Regarding unemployment, 10.2 percent of men were unemployed, while 11.0 percent of women were unemployed, as seen in Table IV.7.

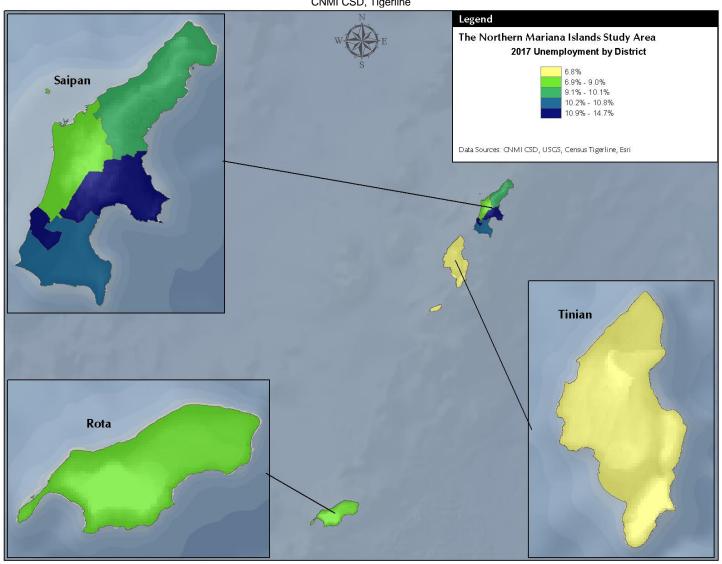
Table IV.7 Labor Force Participation by Gender Northern Mariana Islands 2017 LF Survey								
Gender	General Population	Potential Labor Force Population (persons 16+ years)	Labor Force Population	Employed Population	Unemployed Population	Not In Labor Force Population	Unemployment Rate	Labor Force Participation Rate
Male	27,641	19,515	14,571	13,082	1,489	4,943	10.2 %	74.7 %
Female Total	24,622 52,263	17,904 37,419	10,534 25,105	9,378 22,460	1,157 2,646	7,370 12,313	11.0 % 10.5%	58.8 % 67.1%

The highest levels of labor force participation are seen in those aged between 20 and 54, with participation rates near 80 percent. People aged 55 to 64 have a labor force participation rate of 61 percent. For those aged 65 and older, the participation rate decreases to 31.9 percent. Labor force by age is further detailed in Table IV.8

Table IV.8 Labor Force Participation by Age Northern Mariana Islands 2017 LF Survey								
Age	General Population	Potential Labor Force Population (persons 16+ years)	Labor Force Population	Employed Population	Unemployed Population	Not In Labor Force Population	Unemployment Rate	Labor Force Participation Rate
Less than 16	14,844							
16 to 19 yrs	3,766	3,766	1,217	899	318	2,548	26.2 %	32.3 %
20 to 24 yrs	2,608	2,608	2,081	1,745	336	527	16.2 %	79.8 %
25 to 34 yrs	5,136	5,136	3,845	3,397	448	1,291	11.6 %	74.9 %
35 to 44 yrs	7,656	7,656	6,106	5,569	538	1,549	8.8 %	79.8 %
45 to 54 yrs	9,810	9,810	7,480	6,779	701	2,330	9.4 %	76.3 %
55 to 64 yrs	5,790	5,790	3,529	3,241	288	2,261	8.2 %	61.0 %
65 and older	2,654	2,654	847	830	17	1,807	2.0 %	31.9 %
Total	52,264	37,420	25,105	22,460	2,646	12,313	10.5%	67.1%

The unemployment rate is shown geographically in Map IV.8, on the following page. The highest unemployment rate, at 10.9 to 14.7 percent, was seen in Districts 2 and 5 in Saipan. This was followed by District 1 then District 4. Tinian saw an unemployment rate of 6.8 percent. Rota had an unemployment rate between 6.9 and 9.0 percent.

Map IV.8
Unemployment Rate
Commonwealth of the Northern Mariana Islands
CNMI CSD, Tigerline



As seen in Table IV.9 labor force participation tends to increase with educational attainment in the CNMI. People with less than a high school diploma participate in the labor force at a rate of 42.6 percent, while those with a high school diploma or GED participate at a rate of 70.9 percent. Beyond high school, we see that some college or an associate degree increases the rate to 73.9. A bachelor's degree further increases labor force participation to 86.1 percent.

Table IV.9 Labor Force Participation by Ethnicity Northern Mariana Islands 2017 LF Survey								
Ethnicity	General Population	Potential Labor Force Population (persons 16+ years)	Labor Force Population	Employed Population	Unemployed Population	Not In Labor Force Population	Unemployment Rate	Labor Force Participation Rate
Pacific								
Islander Chamorro	23,267	16,195	8,629	7,193	1,437	7,566	16.7 %	53.3 %
and Carolinian	18,564	13,112	6,953	5,788	1,166	6,159	16.8 %	53.0 %
Micronesian Other Pac	4,503	2,995	1,588	1,336	253	1,407	15.9 %	53.0 %
Islander	200	88	88	69	19		21.3 %	100.0 %
Caucasian	574	531	430	399	31	102	7.2 %	80.9 %
Asian	28,240	20,607	15,980	14,801	1,178	4,628	7.4 %	77.5 %
Chinese	3,829	2,876	2,159	2,080	79	717	3.7 %	75.1 %
Japanese	435	338	245	245		94		72.3 %
Korean	757	584	455	434	21	129	4.6 %	77.8 %
Filipino	21,537	15,681	12,357	11,388	969	3,324	7.8 %	78.8 %
Other Asian	1,683	1,128	765	655	109	363	14.3 %	67.8 %
Other Single	182	85	67	67		19		78.2 %

As education increases, the rate of unemployment tends to decrease. The unemployment rate for those without a high school diploma is 21.3 percent, which decreases dramatically to 9.1 percent for those who have a high school diploma or GED. For those with a bachelor's degree the unemployment rate is 4.5 percent and 3.7 percent for those with a master's degree or beyond.

Table IV.10 Labor Force Participation by Education Northern Mariana Islands 2017 LF Survey								
Education Level	General Population	Potential Labor Force Population (persons 16+ years)	Labor Force Population	Employed Population	Unemployed Population	Not In Labor Force Population	Unemployment Rate	Labor Force Participation Rate
Less than HS Diploma	23,176	8,401	3,576	2,816	761	4,825	21.3 %	42.6 %
High School Diploma or GED	16,627	16,621	11,785	10,713	1,072	4,835	9.1 %	70.9 %
Some College or Associate's	7,449	7,449	5,505	4,877	627	1,945	11.4 %	73.9 %
Bachelor's degree	4,272	4,272	3,677	3,512	165	595	4.5 %	86.1 %
Master's and Beyond	739	676	562	541	21	114	3.7 %	83.2 %
Total	52,263	37,419	25,105	22,459	2,646	12,314	10.5%	67.1%

By language we see that 41,069 people in CNMI speak English and another language and participate in the labor force at a rate of 67.5 percent. Those who speak only English participate at a rate of 63.3 percent, while those who speak Asian languages participate at a rate of 78.7 percent, as seen in **Error! Reference source not found.** IV.11.

		La	bor Force P North	Table IV.11 articipation ern Mariana Isla 2017 LF Survey	by Language _{nds}			
Language Spoken	General Population	Potential Labor Force Population (persons 16+ years)	Labor Force Population	Employed Population	Unemployed Population	Not In Labor Force Population	Unemployment Rate	Labor Force Participation Rate
English	10,658	3,774	2,390	2,057	333	1,384	13.9 %	63.3 %
English and Another Language	41,069	33,645	22,716	20,402	2,313	10,930	10.2 %	67.5 %
Pac. Islands Languages	17,005	14,119	7,351	6,119	1,232	6,768	16.8 %	52.1 %
Asian Languages Other Languages	23,786 278	19,278 248	15,174 190	14,093 190	1,081	4,104 58	7.1 %	78.7 % 76.5 %

The most common employment industry was Arts, Entertainment and Food Services in 2017, accounting got 31.7 percent of employment. This had grown by 41.7 percent since 2010. The next most common industry was Public Administration, accounting for 13.1 percent in 2017, and growing by 33.4 percent since 2010. Agriculture, Forestry, Fishing, and Mining saw the greatest decline from 2010 to 2017, by 82.4 percent.

Table IV.12 Industry For the Employed Civilian Population Northern Mariana Islands 2010 Census & 2017 LF Survey							
Industry	2010	Census	2017 LF Survey		% Change		
madsiry	Persons	% of Total	Persons	% of Total	10–17		
Agriculture, Forestry, Fishing, and Mining	472	1.9%	83	0.34%	-82.42%		
Construction	1,786	7.2%	2,115	8.58%	18.42%		
Manufacturing	689	2.8%	630	2.56%	-8.56%		
Wholesale Trade	700	2.8%	885	3.59%	26.43%		
Retail Trade	2,645	10.7%	3,041	12.33%	14.97%		
Transportation, Warehousing and Utilities	1,429	5.8%	1,621	6.57%	13.44%		
Information	496	2.0%	498	2.02%	0.40%		
Finance, Insurance and Real Estate	1,064	4.3%	614	2.49%	-42.29%		
Professional, Scientific, and Management Services	1,974	8.0%	491	1.99%	-75.13%		
Educational, Health, and Social Services	3,085	12.4%	2,204	8.94%	-28.56%		
Arts, Entertainment and Food Services	5,519	22.2%	7,820	31.72%	41.69%		
Other Services	2,553	10.3%	1,433	5.81%	-43.87%		
Public Administration	2,414	9.7%	3,221	13.06%	33.43%		
Total Working Population	24,826	100%	24,656	100.00%	-0.68%		

Population Income

Households by income for 2017 are shown in Table IV.13. Earnings in the Commonwealth as a whole were most likely between \$10,000 and \$15,000, representing 13,502 incomes. Next most common were earning less than \$10,000, for 3,252 persons. This trend was also true in Saipan itself, as well as Tinian and Rota.

Table IV.13 Population by Income Northern Mariana Islands 2017 LF Survey								
Wage and Salary	CNMI Total	Saipan Total	Tinian Total	Rota Total				
Less than \$10,000	3,252	2,831	204	217				
\$10,000 to \$19,999	13,502	12,410	610	482				
\$20,000 to \$29,999	2,849	2,577	160	112				
\$30,000 to \$39,999	1,464	1,338	74	51				
\$40,000 to \$49,999	609	521	60	28				
\$50,000 to \$74,999	440	418	11	11				
\$75,000 +								

The mean income was \$18,310 for the CNMI as a whole. In Saipan the mean income was \$18,621, \$17,478 in Tinian, and \$17,322 in Rota. The median income was \$13,920 in the CNMI as a whole. It was \$13,800 in Saipan, \$14,000 in Tinian, and \$13,624 in Rota.

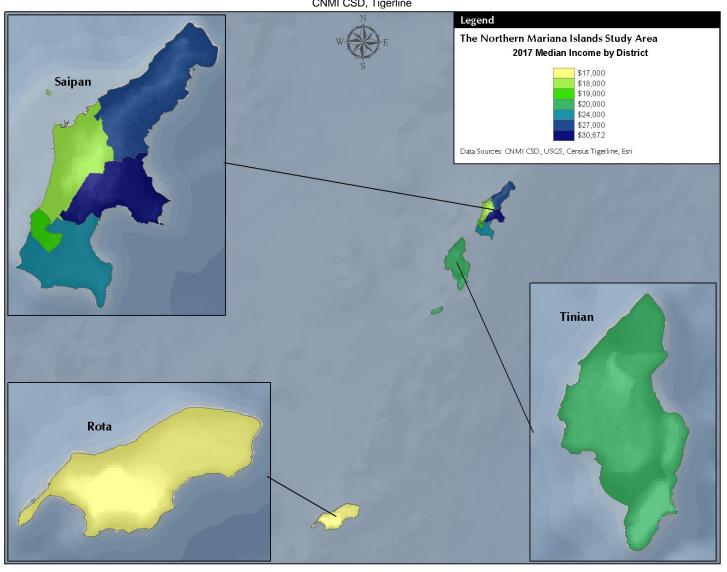
	M o Northe	able IV.14 ean Income rn Mariana Islands 017 LF Survey	;	
Wage and Salary	CNMI Total	Saipan Total	Tinian Total	Rota Total
Median	\$13,920	\$13,800	\$14,000	\$13,624
Mean	\$18,310	\$18,621	\$17,478	\$17,322

Map IV.9, on the following page, shows the median income for households in the CNMI. District 5 in Saipan had the highest median income, at \$30,672. This was followed by District 4 with a median income of \$27,000, and District 1 with a median income of \$24,000. Meanwhile, Tinian had a median income of \$20,000, and Rota had a median income of \$17,000.

Summary

In 2018, unemployment in the Commonwealth of the Northern Mariana Islands was at 10.5 percent. An estimated 74.7 percent of males and 58.8 percent of females participate in the labor force. The most common employment industry was Arts, Entertainment and Food Services in 2017, accounting for 31.7 percent of employment. This had grown by 41.7 percent since 2010. The next most common industry was Public Administration, accounting for 13.1 percent in 2017, and growing by 33.4 percent since 2010. Earnings in the Commonwealth as a whole were most likely between \$10,000 and \$15,000, representing 13,502 incomes. The next most common were earning less than \$10,000, for 3,252 persons. This trend was also true in Saipan itself, as well as Tinian and Rota.

Map IV.9
2017 Median Income
Commonwealth of the Northern Mariana Islands
CNMI CSD, Tigerline



Housing

Households

As seen in Table IV.15, there were a total of 16,707 households in the CNMI in 2017, with 7,669 of those living in a one-family detached house. Another 1,230 were in one-family attached houses, and 5,791 were in buildings with 2 to 10 units. There were 1,805 households living in a building with more than 10 apartment units.

Table IV.15 Households by Type of Housing Unit Northern Mariana Islands 2017 LF Survey										
Type of Household	Saipan District 1	Saipan District 2	Saipan District 3	Saipan District 4	Saipan District 5	Tinian District 6	Rota District 7	CNMI Total		
A one-family house detached from any other house	2,193	497	1,502	812	1,611	522	532	7,669		
A one-family house attached to one or more houses	508	173	282	35	110	94	28	1,230		
A building with 2 to 10 apartments	987	1,243	2,742	143	223	260	193	5,791		
A building with more than 10 apartments	566	138	898	123	74	6	0	1,805		
Other	78	0	98	8	0	17	11	212		
Total	4,332	2,051	5,522	1,121	2,018	899	764	16,707		

Table IV.16 shows that in 2017 9,136 households rent their home for cash, while only 1,101 owned their home with a mortgage or loan. In addition, another 3,103 households owned their home free and clear and 3,366 households occupied their homes without payment.

Table IV.16 Households by Tenure Northern Mariana Islands 2017 LF Survey										
Saipan Saipan Saipan Saipan Tinian Rota Tenure District District District District District District District Total										
Owned with a mortgage or loan	231	2 19	3 171	4 223	5 381	46	30	1,101		
Owned free and clear	848	199	636	406	625	139	250	3,103		
Rented for cash	2,451	1,183	3,719	314	799	436	234	9,136		
Occupied without payment	Occupied without payment 802 649 996 178 213 278 250 3,366									
Total										

In 2017, 3,523 households paid less than \$200 a month in rent, while 3,396 households paid between \$200 and \$399. Only 195 households paid over \$1,000 a month, with 130 of those households in Saipan District 3.

Table IV.17 Households by Rent Amount Northern Mariana Islands 2017 LF Survey									
Rent Amount	Saipan District 1	Saipan District 2	Saipan District 3	Saipan District 4	Saipan District 5	Tinian District 6	Rota District 7	CNMI Total	
Less than \$200	891	504	1,302	137	177	316	196	3,523	
\$200 to \$399	1,091	407	1,312	90	362	101	33	3,396	
\$400 to \$599	371	215	788	72	206	15	5	1,672	
\$700 to \$999	79	58	187	0	28	0	0	352	
\$1,000 +	19	0	130	16	26	4	0	195	
Total	2,451	1,184	3,719	315	799	436	234	9,138	

Table IV.18 shows the mean and median rent by District in 2017. The highest mean rent was \$337 a month, in Saipan District 4, while the lowest was \$131 a month in Rota. The highest median rent was found in Saipan District 5, at \$300 a month, while the median rent was only \$100 a month in Rota.

			Table IN an and Me Iorthern Maria 2017 LF S	dian Rent na Islands			
Rent Amount	Saipan District 1	Saipan District 2	Saipan District 3	Saipan District 4	Saipan District 5	Tinian District 6	Rota District 7
Mean Rent	\$292	\$266	\$313	\$337	\$332	\$222	\$131
Median Rent	\$250	\$200	\$250	\$200	\$300	\$130	\$100

Households were most likely to be built in the 1970s and 1980s, accounting for 27.5 percent of households that were included with ages. However, this data may not provide an accurate estimation of the age of the housing stock due to the lack of data.

Table IV.19 Households by Year Built Northern Mariana Islands 2017 LF Survey									
Year Built	Saipan District 1	Saipan District 2	Saipan District 3	Saipan District 4	Saipan District 5	Tinian District 6	Rota District 7	CNMI Total	
Built 2010 to 2017	8	1	8	5	7		4	33	
Built 2000 to 2009	17	4	13	10	20	12	14	90	
Built 1990 to 1999	41	4	29	38	23	37	28	200	
Built 1980 to 1989	35	4	9	11	9	25	16	109	
Built 1970 to 1979	4	3	2	5	4	3	8	29	
Built 1960 to 1969		2	1			1		4	
Built 1950 to 1959	1			1				2	
Missing	115	87	209	29	50	99	66	655	
Total	221	105	271	99	113	177	136	1,122	

Four room houses are the most common throughout the Commonwealth, with 5,358 four room housing units in the CNMI. Five room housing units were the next most common, with 3,136 units in the CNMI.

	Table IV.20 Households by Number of Rooms Northern Mariana Islands 2017 LF Survey									
Number of Rooms	Saipan District 1	Saipan District 2	Saipan District 3	Saipan District 4	Saipan District 5	Tinian District 6	Rota District 7	CNMI Total		
1 Room	529	429	979	70	47	76	62	2,192		
2 Rooms	277	211	715	213	63	48	62	1,589		
3 Rooms	578	298	968	102	290	237	156	2,629		
4 Rooms	1,332	658	1,920	238	717	242	251	5,358		
5 Rooms	897	375	645	329	586	193	111	3,136		
6 Rooms	348	38	186	124	176	67	90	1,029		
7 Rooms	274	19	70	28	54	36	33	514		
8 or more rooms	97	21	39	16	85	0	0	258		
Total	4,332	2,049	5,522	1,120	2,018	899	765	16,705		

Households with 2 bedrooms were most common in the CNMI in 2017, with 6,134 households living in a 2-bedroom home, as seen in Table IV.21. Another 5,678 households lived in a 1-bedroom home and 3,250 lived in a 3-bedroom home.

	Table IV.21 Households by Number of Bedrooms Northern Mariana Islands 2017 LF Survey									
Number of Bedrooms	Saipan District 1	Saipan District 2	Saipan District 3	Saipan District 4	Saipan District 5	Tinian District 6	Rota District 7	CNMI Total		
1 Bedroom	1,166	881	2,478	351	271	315	216	5,678		
2 Bedrooms	1,733	738	2,061	280	771	283	268	6,134		
3 Bedrooms	846	333	679	315	718	209	150	3,250		
4 Bedrooms	387	58	245	101	174	84	90	1,139		
5 Bedrooms	162	19	59	67	19	8	28	362		
6 or more bedrooms	38	21	0	8	66	0	12	145		
Total	4,332	2,050	5,522	1,122	2,019	899	764	16,708		

Housing costs are shown in Maps IV.10 though IV.15. Map IV.10 shows rent amount in the CNMI. Rents were highest in Saipan's District 5 at \$251-\$300 each month. This was followed by \$201-\$250 in Districts 1 and 3. In Tinian, the median rent was \$100-\$130 and was \$100 in Rota.

Maps IV.11 through IV.15 show the various home values. More than a quarter of housing units in Districts 2 and 4 were worth less than \$50,000, as seen in Map IV.11. Meanwhile, more than 35.1 percent of housing units in Rota and Tinian were values between \$50,000 and \$100,000 in 2017. In District 5 in Saipan, 19.8 to 30.2 percent of housing units were values between \$100,000 and \$150,000, and 19.1 to 25.5 percent were values between \$150,000 and \$300,000. The highest rate of home values above \$300,000 was seen in District 3, in which 10.7 to 13.7 percent of houses are valued.

VACANT HOUSING

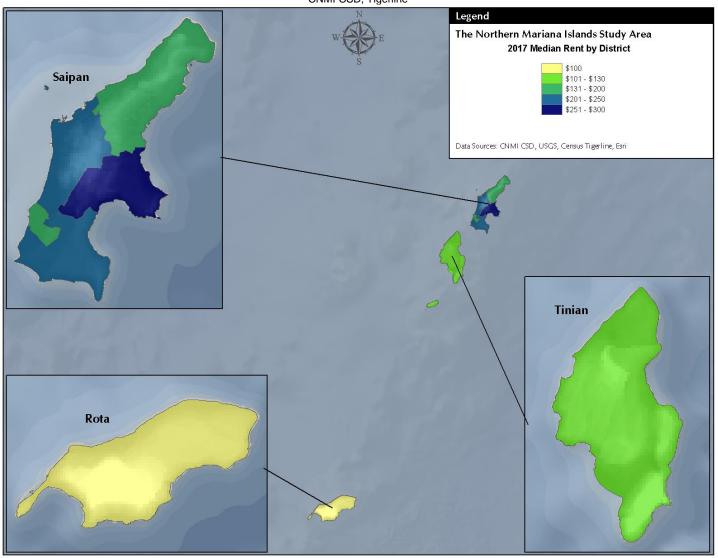
In 2010, the overall vacancy rate throughout the Commonwealth had risen to 23.1 percent. As shown in Map IV.16, areas with above-average concentrations of vacant units appeared throughout the three main islands. More than a third of housing units were unoccupied in block groups to the north of American Memorial Park on Saipan, as well as in the large, sparsely populated block group covering most of Rota.

A majority of vacant housing units were available for rent or for sale, or were slated for other uses in 2010. However, 31.4 percent of vacant housing units throughout the Commonwealth were classified as "other vacant." In many cases, areas with high concentrations of "other vacant" units tended to have lower overall vacancy rates. However, there were some notable concentrations of "other vacant" units in the block group to the immediate south of American Memorial Park in 2010, as shown in Map II.17, as well as in Kagman III and Capitol Hill. "Other vacant" units also accounted for a relatively large share of housing units on Tinian, in a block group in central San lose.

"Other vacant" housing units accounted for a third of all vacant housing units in the Commonwealth in 2010. In that year, "other vacant" units tended to account for relatively large shares of vacant housing units in and around Kagman, San Jose (Oleai), and As Terlaje on Saipan, as shown in Map II.18.

Map IV.10
2017 Median Rent
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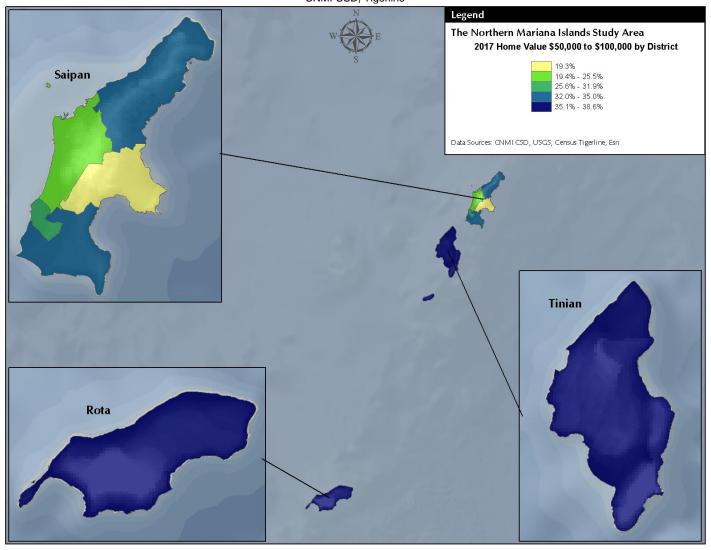
Commonwealth of the Northern Mariana Islands CNMI CSD, Tigerline



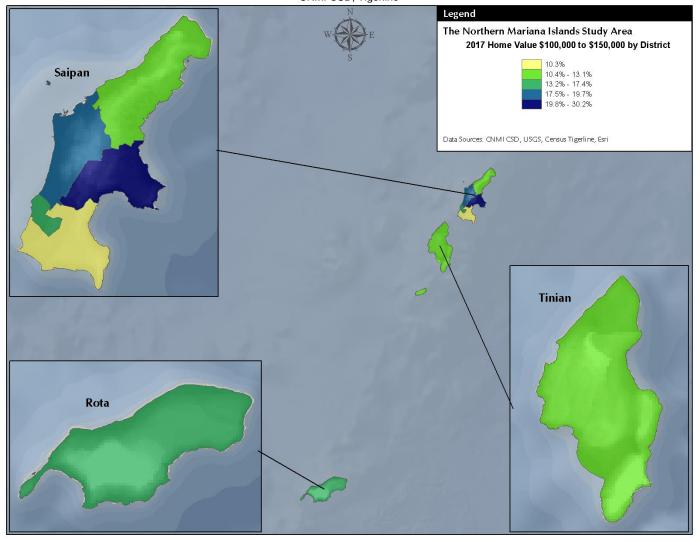
Map IV.11
2017 Home Value up to \$50,000
Commonwealth of the Northern Mariana Islands

CNMI CSD, Tigerline Legend The Northern Mariana Islands Study Area 2017 Home Value Less than \$50,000 by District 20.6% Saipan 20.7% - 21.4% 21.5% - 24.6% 24.7% - 26.7% 26.8% - 35.4% Data Sources: CNMI CSD, USGS, Census Tigerline, Esri Tinian Rota

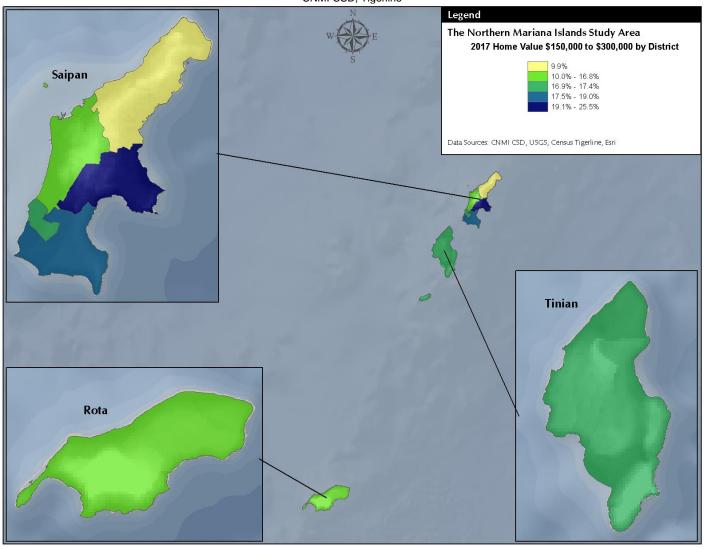
Map IV.12
2017 Home Value \$50,000 to \$100,000
Commonwealth of the Northern Mariana Islands
CNMI CSD, Tigerline



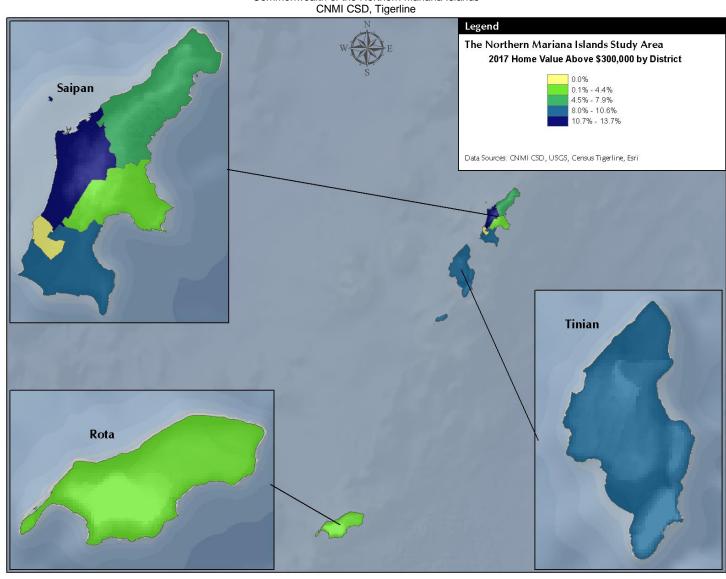
Map IV.13
2017 Home Value \$100,000 to \$150,000
Commonwealth of the Northern Mariana Islands
CNMI CSD, Tigerline



Map IV.14
2017 Home Value \$150,000 to \$300,000
Commonwealth of the Northern Mariana Islands
CNMI CSD, Tigerline

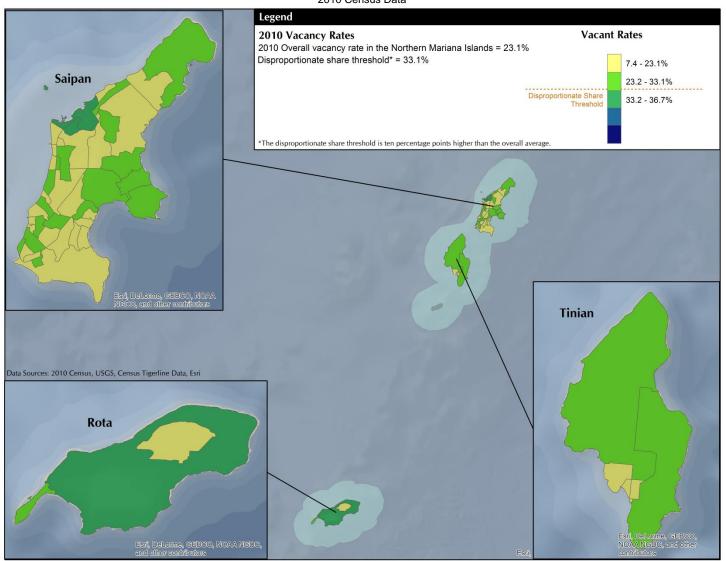


Map IV.15
2017 Home Value over \$300,000
Commonwealth of the Northern Mariana Islands



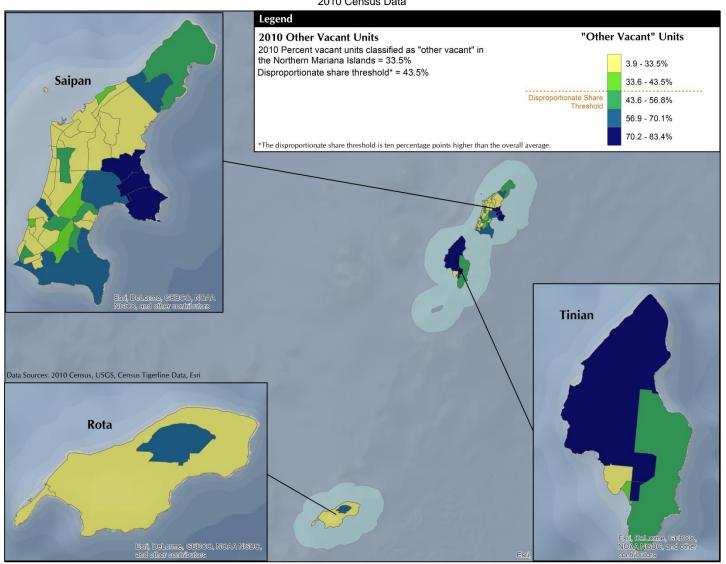
Map IV.16 2010 Vacant Housing Units

The Northern Mariana Islands 2010 Census Data



Map IV.17 2010 "Other Vacant" Housing Units

The Northern Mariana Islands 2010 Census Data



Summary

There were a total of 16,707 households in the CNMI in 2017, with 7,669 of those living in a one-family detached house. In 2017, 9,136 households rent their home for cash, while only 1,101 owned their home with a mortgage or loan. In addition, another 3,103 households owned their home free and clear and 3,366 households occupied their homes without payment. Households with 2 bedrooms were most common in the CNMI in 2017, with 6,134 households living in a 2-bedroom home. Housing costs varied throughout the Commonwealth. Rents were highest in Saipan's District 5 at \$251-\$300 each month. This was followed by \$201-\$250 in Districts 1 and 3. In Tinian, the median rent was \$100-\$130 and was \$100 in Rota. More than a quarter of housing units in Districts 2 and 4 were worth less than \$50,000. Meanwhile, more than 35.1 percent of housing units in Rota and Tinian were values between \$50,000 and \$100,000 in 2017. In District 5 in Saipan, 19.8 to 30.2 percent of housing units were values between \$100,000 and \$150,000, and 19.1 to 25.5 percent were values between \$150,000 and \$300,000.

B. DISPROPORTIONATE HOUSING NEEDS

The Census Bureau collects data on several topics that HUD has identified as "housing problems." For the purposes of this report, housing problems include overcrowding, incomplete plumbing or kitchen facilities, and cost-burden. Some of this data has also been collected by the Labor Force Survey. When available, information has been updated to include these data as well.

Table IV.22 shows households with hot water by District. In 2017, in the CNMI, 3,853 households had hot and cold piped water, while 12,717 had only cold piped water, and an additional 140 had no piped water in their household. By District we see that 81 households in Saipan District 1, 40 households in Saipan District 3, 13 households in Saipan District 4, and 6 households in Tinian had no piped water, while Saipan District 2, Saipan District 5, and Rota all had 0 households without piped water.

		Househ			t Water			
Presence of Hot Water	Saipan District 1	Saipan District 2	Saipan District 3	Saipan District 4	Saipan District 5	Tinian District 6	Rota District 7	CNMI Total
Yes, hot and cold piped water	969	339	1,625	281	385	137	117	3,853
No, only cold piped water	3,282	1,712	3,858	828	1,633	756	648	12,717
No piped water	81	0	40	13	0	6	0	140
Total	4,332	2,051	5,523	1,122	2,018	899	765	16,710

Table IV.23 and Table IV.24 show households by presence of plumbing and kitchen facilities in 2017, respectively. In 2017, the CNMI 15,958 households had complete plumbing while 750 did not. Households without complete kitchen facilities were more common than households without plumbing, at 1,132 households.

	1	Households	by Presenc	riana Islands	ete Plumbing	1		
Complete Plumbing	Saipan District 1	Saipan District 2	Saipan District 3	Saipan District 4	Saipan District 5	Tinian District 6	Rota District 7	CNMI Total
Yes, complete plumbing	4,195	1,993	5,165	1,026	1,924	891	764	15,958
No plumbing	137	58	357	95	95	8	0	750
Total	4,332	2,051	5,522	1,121	2,019	899	764	16,708

Table IV.24 Households by Presence of Complete Kitchen Facilities Northern Mariana Islands 2017 LF Survey									
Complete Kitchen	Saipan District 1	Saipan District 2	Saipan District 3	Saipan District 4	Saipan District 5	Tinian District 6	Rota District 7	CNMI Total	
Yes, complete kitchen	4,041	1,936	5,066	970	1,915	889	759	15,576	
No	291	115	456	151	104	10	5	1,132	
Total	4,332	2,051	5,522	1,121	2,019	899	764	16,708	

An estimated 14,255 households had access to a public water system only, an estimated 1,707 households had access to a public water system and a cistern. 524 households have access to a cistern, tank, or drum only, and 223 households have another water source, such as an individual well or spring.

	Table IV.25 Households by Access to Water Northern Mariana Islands 2017 LF Survey Sainan Sainan Sainan Sainan Sainan Sainan Sainan CNMI								
Access to Water	Saipan District 1	Saipan District 2	Saipan District 3	Saipan District 4	Saipan District 5	Tinian District 6	Rota District 7	CNMI Total	
A public system only	3,956	1,676	4,629	526	1,870	887	711	14,255	
A public system and cistern	177	298	656	490	66	8	12	1,707	
A cistern, tanks, or drums only	180	58	138	44	83	4	17	524	
Some other source like an individual well or spring	19	19	99	62	_	_	24	223	
Total	4,332	2,051	5,522	1,122	2,019	899	764	16,709	

In 2017, the CNMI 4,859 households had no access to the internet, as seen in Table V.26. Of those with access to the internet, 7,166 households had a DSL subscription, while 1,179 had a cable modem and 3,505 accessed the internet in another way.

	Table V.26 Households by Access to Internet Northern Mariana Islands 2017 LF Survey Scient									
Access to Internet	Saipan District 1	Saipan District 2	Saipan District 3	Saipan District 4	Saipan District 5	Tinian District 6	Rota District 7	CNMI Total		
Yes, Digital Subscriber Line (DSL)	2,041	625	2,260	429	1,097	372	342	7,166		
Yes, Cable Modem	315	161	316	116	122	75	74	1,179		
Yes, other	571	758	1,593	62	167	212	142	3,505		
No	1,405	508	1,352	514	632	240	208	4,859		
Total	4,332	2,052	5,521	1,121	2,018	899	766	16,709		

As shown in Table IV.27, 15 percent of households throughout the Commonwealth were cost-burdened in 2000, meaning that housing costs took up 30 percent or more of the household income. By 2010 that figure had risen to 20.3 percent. This housing problem tended to fall more heavily on homeowners with a mortgage: 26.1 percent of mortgagors were impacted by cost-burdening in 2000, a figure which had grown to 31.2 percent by 2010.

Table IV.27 Cost Burden by Tenure Northern Mariana Islands							
	Loop Thou	- 200/	2000 & 2010		Net Com	a vota al	
Census	Less Thar		30% and		Not Com		
Year	Households	% of	Households	% of	Households	% of	Total
		Total		Total		Total	
			Owner With a	Mortgage			
2000	903	73.0%	322	26.1%	11	0.9%	1236
2010	865	68.0%	397	31.2%	10	0.8%	1272
			Owner Without	a Mortgage)		
2000	2568	91.2%	119	4.2%	129	4.6%	2816
2010	2835	86.8%	289	8.9%	141	4.3%	3265
			Rent	er			
2000	4814	50.6%	1593	8.8%	3099	32.6%	9506
2010	5920	51.5%	2575	12.2%	3003	26.1%	11498
			Tota	al .			
2000	8285	61.1%	2034	15.0%	3239	23.9%	13558
2010	10457	65.2%	3261	20.3%	3154	19.7%	16035

Renters with a severe cost burden are at risk of homelessness. Cost-burdened renters who experience one financial setback often must choose between rent and food or rent and health care for their families. Similarly, homeowners with a mortgage who have just one unforeseen financial constraint, such as temporary illness, divorce, or the loss of employment, may face foreclosure or bankruptcy. Furthermore, households that no longer have a mortgage yet still experience a severe cost burden may be unable to conduct periodic maintenance and repair of their homes, and in turn, may contribute to a dilapidation and blight problem. All three of these situations should be of concern to policymakers and program managers.

C. PUBLICLY SUPPORTED HOUSING ANALYSIS

VOUCHER-ASSISTED HOUSING UNITS

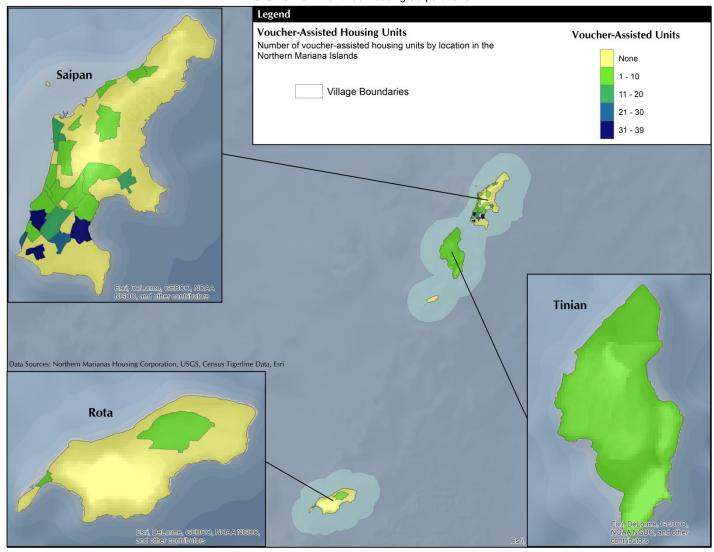
Housing Choice Vouchers are portable housing subsidies: recipients can choose where to live as long as the landlord accepts the vouchers and the unit meets a certain set of HUD-defined criteria. The program covers monthly rental costs minus the tenant's contribution, which is at most thirty percent of his or her monthly adjusted income or ten percent of monthly unadjusted gross income. The Northern Marianas Housing Corporation administers the Housing Choice Voucher Program on behalf of Commonwealth residents.

The numbers of Housing Choice Vouchers in use in Villages throughout the Commonwealth is presented in Map IV.18, on the following page. Although there were voucher-assisted housing units located throughout Saipan, they were more common in Villages near the southern end of the Island, which also tended to have larger populations. The greatest number of housing choice vouchers appeared in Chalan Konoa, Koblerville, and Dandan, where between 31 and 39 households were assisted through the voucher program. There were a handful of vouchers issued on Tinian, as well as in Songsong and Sinapalo on the Island of Rota.

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Map IV.18 Voucher-Assisted Housing Units

The Northern Mariana Islands 2015 Northern Marianas Housing Corporations



D. DISABILITY AND ACCESS ANALYSIS

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination based on disability in any program or activity receiving federal assistance.⁷ Title II of the Americans with Disabilities Act of 1990 prohibits discrimination based on disability by public entities. HUD enforces the housingrelated activities of public entities, including public housing, housing assistance, and housing referrals.8

Persons with Disabilities

Some 5.5 percent of the Commonwealth population was living with some form of disability in 2010, as shown in Table IV.28, below.

Table IV.28 Disability by Age Northern Mariana Islands 2010 Census								
	Ma	le	Fem	ale	Tot	:al		
Age	Disabled	Disability	Disabled	Disability	Disabled	Disability		
	Population	Rate	Population	Rate	Population	Rate		
Under 5	11	0.4%	12	0.5%	23	0.5%		
5 to 17	242	3.8%	184	3.1%	426	3.5%		
18 to 34	200	3.9%	170	2.9%	370	3.4%		
35 to 64	749	5.9%	786	7.0%	1535	6.4%		
65 to 74	166	26.1%	184	36.7%	350	30.8%		
75 or Older	101	51.3%	144	62.6%	245	57.4%		
Total	1469	5.3%	1480	5.7%	2949	5.5%		

As found in the Labor Force Survey, there are various degrees of disabilities in the Commonwealth. The common disability is difficulty climbing stairs throughout the CNMI, at 2.6 percent. Some 2.3 percent of the CNMI population had difficulty seeing, 1.7 percent had difficulty doing errands, 1.5 percent had a physical, metal, or emotional condition, and 1.2 percent had difficulty bathing or dressing. These difficulties were also seen at different rates in the Commonwealth. Overall, Rota saw the highest rate of difficulties, with 6.0 percent having difficulty climbing stairs, and 5.6 percent with seeing difficulties, and 4.0 percent with a physical, metal, or emotional condition. By contrast, 4.5 percent of persons in Tinian had difficulty seeing, and 1.8 percent had difficulty hearing. In Saipan, some 2.5 percent had difficulty climbing stairs, 2.1 percent had difficulty hearing, and 2.1 percent had difficulty seeing.

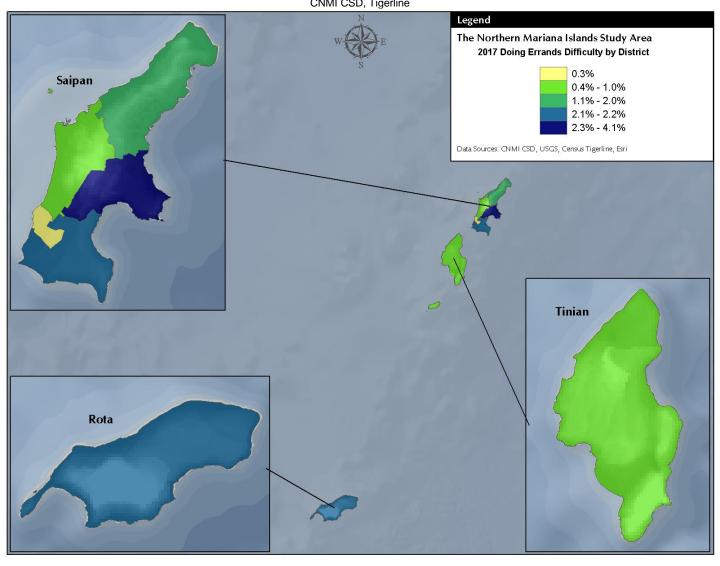
^{7 29} U.S.C. §§794

Table IV.29 Disability by Type Northern Mariana Islands 2017 LF Survey							
CNMI Saipan Total Tinian Total Total							
Difficulty Hearing	2.2%	2.1%	1.8%	3.9%			
Difficulty Bathing or Dressing	1.2%	1.3%	0.2%	1.4%			
Difficulty doing Errands	1.7%	1.7%	1.0%	2.2%			
Difficulty Seeing	2.3%	2.1%	4.5%	5.6%			
Physical, Mental or Emotional Condition 1.5% 1.4% 1.1% 4.0%							
Difficulty Climbing Stairs	2.6%	2.5%	1.5%	6.0%			

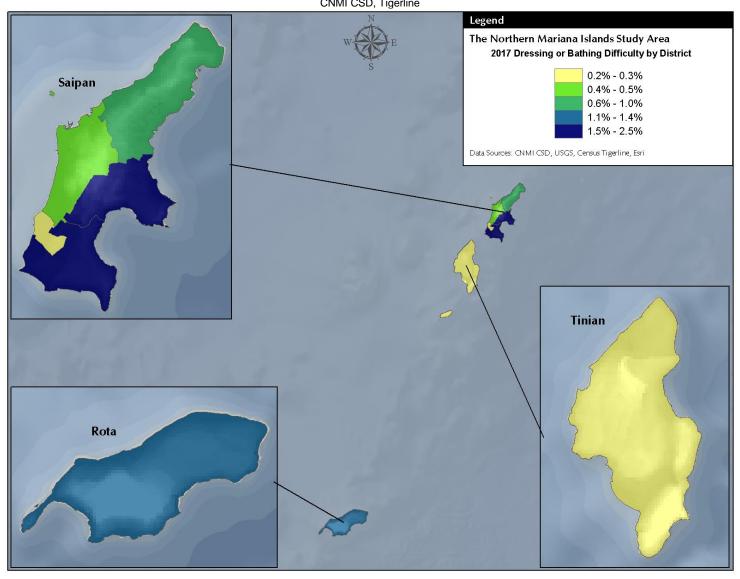
Geographic Distribution of Persons with Disabilities

Maps IV.19 through IV.24 show the various types of disabilities in the CNMI. The Island of Rota tended to have higher concentrations of persons with various disabilities in the CNMI.

Map IV.19
2017 Difficulty Doing Errands
Commonwealth of the Northern Mariana Islands
CNMI CSD, Tigerline

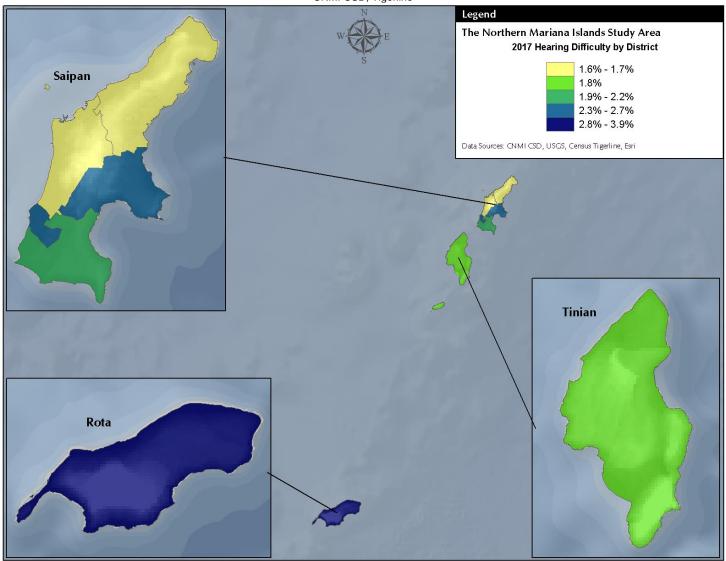


Map IV.20
2017 Difficulty Dressing or Bathing
Commonwealth of the Northern Mariana Islands
CNMI CSD, Tigerline



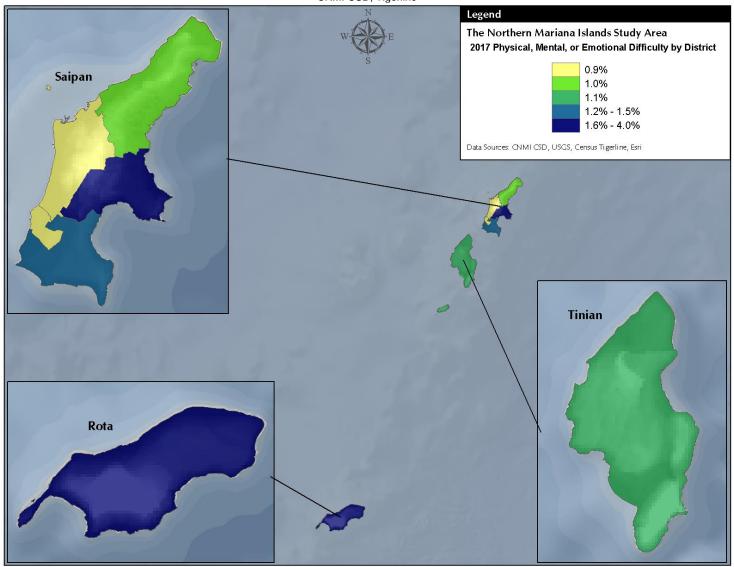
Map IV.21

2017 Difficulty Hearing
Commonwealth of the Northern Mariana Islands
CNMI CSD, Tigerline



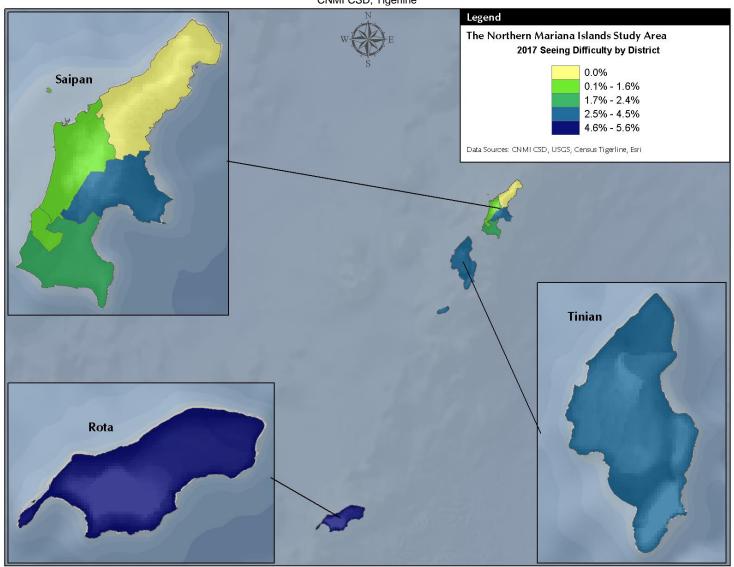
Map IV.22
2017 Physical, Mental, or Emotional Difficulties
Commonwealth of the Northern Mariana Islands

nwealth of the Northern Mariana Islands
CNMI CSD, Tigerline

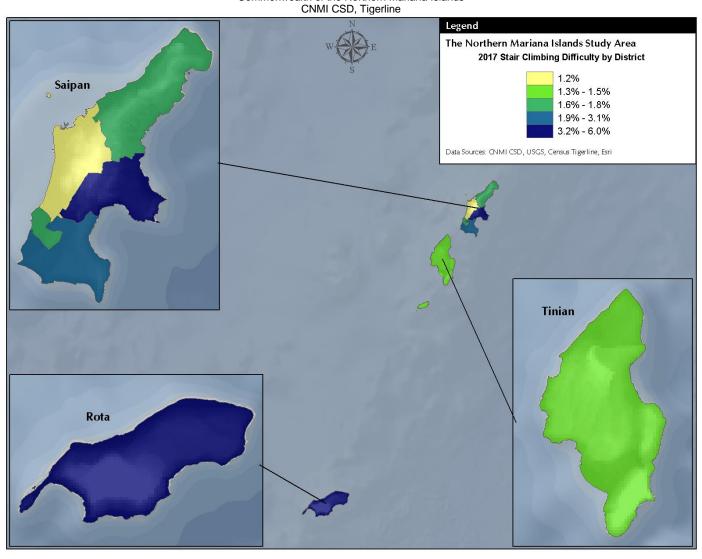


Map IV.23

2017 Difficulty Seeing
Commonwealth of the Northern Mariana Islands
CNMI CSD, Tigerline



Map IV.24
2017 Difficulty Climbing Stairs
Commonwealth of the Northern Mariana Islands



E. FAIR HOUSING ENFORCEMENT, OUTREACH CAPACITY, & RESOURCES

FEDERAL FAIR HOUSING LAWS

Federal laws provide the backbone for U.S. fair housing regulations. The following federal and state rules, regulations, and executive orders inform municipalities and developers of their fair housing obligations and the rights of protected classes. Many of these statutes were successful in generating specialized resources, such as data, to aid organizations, government entities, and individuals in affirmatively furthering fair housing. While some laws have been previously discussed in this report, a list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD's) website, is presented below:

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act)⁹

The Fair Housing Act prohibits discrimination in the sale, rental, financing, and insuring of housing on the basis of race, color, religion, sex, and national origin. In 1988, the act was amended to include family status and disability as protected classes, which includes children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18. Jurisdictions may add protected classes but are not allowed to subtract from the seven federally protected classes.¹⁰ The Act also contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.¹¹ On April 30, 2013, HUD and the Department of Justice released a Joint Statement that provides guidance regarding the persons, entities, and types of housing and related facilities that are subject to the accessible design and construction requirements of the Act.

It is unlawful under the Act to discriminate against a person in a protected class by: Refusing to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, familial status, or national origin; discriminating against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities based on a protected class; representing that a dwelling is not available for inspection, sale, or rental when it is, in fact, available; publishing an advertisement indicating any preference, limitation, or discrimination against a protected class; or refusing to allow a person with a disability to make a reasonable modification to the unit at the renter's own expense.

There are several exceptions to the law. It is legal for developments or buildings for the elderly to exclude families with children. In addition, single-family homes being sold by the owner of an owner-occupied 2 family home may be exempt, unless a real estate agency is involved, if they have advertised in a discriminatory way, or if they have made discriminatory statements. There are no exemptions for race discrimination because race is covered by other civil rights laws.

The following are examples of Fair Housing Act violations:

1. Making any representation, directly or implicitly, that the presence of anyone in a protected class in a neighborhood or apartment complex may or will have the effect of lowering

http://portal.hud.gov/hudportal/HUD?src=/program offices/fair housing equal opp/FHLaws

11 "Title VIII: Fair Housing and Equal Opportunity."

http://portal.hud.gov/hudportal/HUD?src=/program offices/fair housing equal opp/progdesc/title8

^{9 42} U.S.C. 3601, et. Seq., as amended in 1988

^{10 &}quot;HUD Fair Housing Laws and Presidential Executive Orders."

property taxes, reduce safety, make the neighborhood and/or schools worse, change the character of the neighborhood, or change the ability to sell a home.

- 2. Providing inconsistent, lesser, or unequal service to customers or clients who are members of a protected class, such as failing to return calls from a buyer agent to avoid presenting a contract to your seller, avoiding or delaying an appointment for a showing a listing, making keys unavailable, failing to keep appointments, or refusing maintenance or repairs to an apartment.
- 3. Requiring higher standards for a member of a protected class, including asking for more references or demanding a higher credit rating.
- 4. Requiring employers to make distinctions on applications, or in the application process, among protected class members, including marking applications to indicate race, sex, etc. of applicant or misrepresenting availability for particular protected classes.
- 5. Advertising in a manner that indicates a preference for a particular class and thereby excluding protected class members.

Title VI of the Civil Rights Act of 1964

Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance, including denying assistance, offering unequal aid, benefits, or services, aiding or perpetuating discrimination by funding agencies that discriminate, denying planning or advisory board participation, using discriminatory selection or screening criteria, or perpetuating the discrimination of another recipient based on race, color, or national origin.

Section 504 of the Rehabilitation Act of 1973

The Act prohibits discrimination based on disability in any program or activity receiving federal financial assistance. The concept of "reasonable accommodations" and "reasonable modifications" was clarified in memos dated May 17, 2004 and March 5, 2008. Reasonable accommodations are changes in rules, policies, practices, or services so that a person with a disability can participate as fully in housing activities as someone without a disability. Reasonable modifications are structural changes made to existing premises, occupied or to be occupied by a person with a disability so they can fully enjoy the premises.

Section 109 of the Housing and Community Development Act of 1974

Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs or activities funded from HUD's Community Development Block Grant Program.

Title II of the Americans with Disabilities Act of 1990

Title II applies to state and local government entities and protects people with disabilities from discrimination on the basis of disability in services, programs, and activities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

Architectural Barriers Act of 1968

The Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 be accessible to and useable by handicapped persons. The ABA specifies accessibility standards for ramps, parking, doors, elevators, restrooms, assistive listening systems, fire alarms, signs, and other accessible building elements and is enforced through the Department of Defense, HUD, the General Services Administration, and the U.S. Postal Services.

Age Discrimination Act of 1975

The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance, applies to all ages, and may be enforced by the head of any Federal department or agency by terminating grant funding for those with an express finding on the record who fail to comply with the Act after reasonable notice. HUD established regulations for implementation of the Age Discrimination Act for HUD programs.

Title IX of the Education Amendments Act of 1972

Title IX prohibits discrimination on the basis of sex or blindness in education programs or activities that receive federal financial assistance.¹²

The Home Mortgage Disclosure Act (HMDA)

HMDA requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans, including the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Depository institutions that meet the following criteria are required to report:

- Bank, credit union, or savings association
- Total assets must exceed the coverage threshold¹³
- The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA)
- The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling
- The institution must be federally insured or regulated
- The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac

For other institutions, including non-depository institutions, the reporting criteria are:

- 1. The institution must be a for-profit organization
- 2. The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than \$25 million
- 3. The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing on property located in an MSA in the preceding calendar year

^{12 &}quot;HUD Fair Housing Laws and Presidential Executive Orders."

¹³ Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer price Index for Urban Wage Earners and Clerical Workers.

4. The institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year

In addition to reporting race and ethnicity data for loan applicants, the HMDA reporting requirements were modified in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

- 1. If they are HOEPA loans
- 2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans)
- 3. Presence of high-annual percentage rate loans (HALs), defined as more than three percentage points for purchases when contrasted with comparable treasury instruments or five percentage points for refinance loans

EXECUTIVE ORDERS

Executive Order 11063 Equal Opportunity in Housing

Signed by President Kennedy on November 20, 1962, the Order prohibits discrimination based on race, color, religion, creed, sex, or national origin in the sale, leasing, rental, or other disposition of properties and facilities owned, operated, or funded by the federal government. The Order also prohibits discrimination in lending practices that involve loans insured or guaranteed by federal government.

Executive Order 12892 Leadership and Coordination of Fair Housing in Federal Programs: Affirmatively Furthering Fair Housing

Signed by President Clinton on January 11, 1994, the Order required federal agencies to affirmatively further fair housing in the programs and activities with the Secretary of HUD coordinating the effort, and established the President's Fair Housing Council, which is chaired by the Secretary of HUD.

Executive Order 12898 Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations

Signed by President Clinton on February 11, 1994, the order requires federal agencies to practice environmental justice in its programs, policies, and activities. Specifically, developers and municipalities using federal funds must evaluate whether or not a project is located in a neighborhood with a concentration of minority and low-income residents or a neighborhood with disproportionate adverse environmental effects on minority and low-income populations. If those conditions are met, viable mitigation measures or alternative project sites must be considered.

Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency

Signed by President Clinton on August 11, 2000, the Order eliminates limited English proficiency as a barrier to full and meaningful participation in federal programs by requiring federal agencies to examine the services they provide, identify the need for LEP services, then develop and implement a system to provide those services. The Department of Justice issued policy guidance which set forth compliance standards to ensure accessibility to LEP persons.

Executive Order 13217 Community Based Alternatives for Individuals with Disabilities

Signed by President Bush on June 18, 2001, the Order requires federal agencies to evaluate their policies and programs to determine if they need to be revised to improve the availability of community-based living arrangements for persons with disability, noting that isolating or segregating people with disabilities in institutions is a form of disability-based discrimination prohibited by Title II of the ADA.

COMMONWEALTH FAIR HOUSING LAWS AND RESOURCES

The 11th Legislature of the Northern Mariana Islands adopted the "Commonwealth Fair Housing Act" in 1998. ¹⁴ The purpose of the Act was to "ensure that discrimination does not occur in housing transactions" while maintaining "the greatest degree of self-determination and control over the internal operations of the Commonwealth." ¹⁵ Passage of the law was intended to enable HUD to begin referring fair housing complaints to a local agency for investigation and enforcement. ¹⁶ However, there are currently no Commonwealth agencies participating in the FHAP.

COMMONWEALTH AGENCY

The Commonwealth Fair Housing Act vests authority for administration and enforcement of commonwealth fair housing law in the Corporate Director of the Northern Marianas Housing Corporation. Residents who believe that they have experienced discrimination on the basis of race, color, religion, national origin, sex, disability, familial status, or marital status, may contact the Housing Corporation to file a complaint. The Corporation's Family Self-Sufficiency Coordinator serves as Fair Housing Officer on behalf of the Corporate Director, and may be contacted through the following information:

Northern Marianas Housing Corporation

Family Self-Sufficiency (FSS) Program Coordinator P.O. Box 500514 Saipan, MP 96950

Telephone: 1(670)234-6866/9447/7670

Fax: (670)234-9021

Web Site: http://www.nmhcgov.net Email: fsscoordinator@nmhcgov.net

FAIR HOUSING COMPLAINTS

Federal Fair Housing Law prohibits housing discrimination based on race, color, national origin, religion, sex, familial status, or disability. An individual may file a complaint if they feel their rights have been violated. HUD maintains records of complaints that represent potential and actual violations of federal housing law.

Fair Housing and Equal Opportunity (FHEO) begins its complaint investigation process shortly after receiving a complaint. A complaint must be filed within one year of the last date of the alleged discrimination under the Fair Housing Act. Other civil rights authorities allow for complaints to be

^{14 2} CMC §40101 et seq

¹⁵ PL 11-38 §1

¹⁶ Ibid.

filed after one year for good cause, but FHEO recommends filing as soon as possible. Generally, FHEO will either investigate the complaint or refer the complaint to another agency to investigate. Throughout the investigation, FHEO will make efforts to help the parties reach an agreement. If the complaint cannot be resolved voluntarily by an agreement, FHEO may issue findings from the investigation. If the investigation shows that the law has been violated, HUD or the Department of Justice may take legal action to enforce the law.

As noted previously, the Department of Housing and Urban Development accepts complaints from Commonwealth residents who believe that they have been subjected to illegal discrimination in the housing market. However, HUD has not received any such complaints since 2004, as noted in Figure A.1 in Appendix A, a response by a HUD representative to a recent request for fair housing complaint data.

Northern Marianas Housing Corporation

In addition to the U.S. Department of Housing and Urban Development, Northern Mariana Islanders who believe that they have been subjected to illegal discrimination in the Commonwealth housing market may file a complaint with the Corporate Director of the Northern Marianas Housing Corporation. The Corporate Director is responsible for administering the provisions of the Commonwealth Fair Housing Act ("Commonwealth FHA").¹⁷

Because the Commonwealth FHA was written to be substantially equivalent to the Federal Fair Housing Act, the complaint process that is laid out in the Commonwealth law closely follows the process set forth in the Federal law, as described above, and both laws provide for similar rights, remedies, restrictions, and timelines. The principal difference between the two laws is that the Commonwealth law prohibits discrimination on the basis of marital status, along with all of the bases included in the Federal FHA.

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^{17 2} CMC §40107

F. FAIR HOUSING SURVEY RESULTS

The Fair Housing survey has a total of 233 responses to date. Table IV.30 shows which areas of the CNMI respondents would like to address in the survey. The majority of respondents, 172 people, indicated that they would like to address Saipan, while another 45 responded that they would like to address the entire Commonwealth of the Northern Mariana Islands. Finally, 12 people selected Tinian, two people selected Northern Islands Municipality, and two people selected Rota. Survey results are available by jurisdiction in Appendix A.

Table IV.30 Which areas of the Commonwealth of the Northern Marianas Islands do you wish to address? CNMI Total Fair Housing Survey					
Community	Number of Respondents:				
Northern Islands Municipality	2				
Saipan	172				
Tinian	12				
Rota	2				
Commonwealth of Northern Mariana Islands	45				
Other	0				
Total	233				

As seen in Table IV.31, some 36 respondents indicated that their primary role in the housing industry was an Advocate, while 28 respondents indicated that they were a service provider, and another 27 indicated that they were involved in the local government.

Table IV.31 What is your primary role in the housing industry? CNMI Total Fair Housing Survey				
Role	Total			
Advocate	36			
Appraisal	1			
Banking/Finance	4			
Construction/Development	9			
Insurance	2			
Law/Legal Services	4			
Local government	27			
Property Management	7			
Real estate	10			
Service Provider	28			
Other	51			
Missing	54			
Total	233			

Table IV.32 shows that of the 233 respondents, 115 were renters, while 64 were homeowners and another 38 indicated 'other.'

Table IV.32 Are you a: CNMI Total Fair Housing Survey					
Role	Total				
Homeowner	64				
Renter	115				
Other	38				
Missing	16				
Total	233				

When asked about their familiarity with Fair Housing Laws, 15 respondents indicated that they were Very Familiar with Fair Housing Laws, 57 indicated that they were Somewhat Familiar, while 83 indicated that they were Not Familiar. Finally, another 78 people did not respond to the question.

Table IV.33 How familiar are you with Fair Housing Laws? CNMI Total Fair Housing Survey				
Role	Total			
Not Familiar	83			
Somewhat Familiar	57			
Very Familiar	15			
Missing	78			
Total	233			

Table IV.34 shows that when asked about Fair Housing Laws, 96 respondents indicated that they think fair housing laws serve a useful purpose. Some 29 respondents think fair housing laws are difficult to understand or follow, while 35 responded that they feel fair housing laws are adequately enforced in the Commonwealth. Only 22 respondents said that they know of educational activities or training opportunities, and only six respondents indicated that they know of fair housing testing of any sort in the Commonwealth.

Table IV.34 Fair Housing Laws CNMI Total Fair Housing Survey						
Question	Yes	No	Don't Know	Missing	Total	
Do you think fair housing laws serve a useful purpose?	96	10	52	75	233	
Do you think fair housing laws are difficult to understand or follow?	29	75	53	76	233	
Do you feel that fair housing laws are adequately enforced in the Commonwealth?	35	46	70	82	233	
Based on your knowledge of fair housing law, do you think that additional groups should be protected under the CNMI fair housing law?	36	23	90	84	233	
Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law. Do you know of any educational activities or training opportunities available to you to learn about fair housing laws?	22	77	53	81	233	
If you answered "yes" to the previous question, have you participated in fair housing activities or training?	19	60	30	124	233	
Fair housing testing is often used to assess potential violations of fair housing law. Testing can include activities such as evaluating building practices to determine compliance with accessibility laws or testing if some people are treated differently when inquiring about available rental units. Do you know of any fair housing testing of any sort in the Commonwealth?	6	83	61	83	233	

Regarding the level of fair housing outreach and education activity in the Commonwealth, 56 respondents indicated that there was too little, while 79 said that they do not know. Only 12 respondents indicated that there was the right amount of fair housing testing in the Commonwealth, and 40 indicated there was too little.

Table IV.35 Fair Housing Laws CNMI Total Fair Housing Survey							
Question	Too Much	Right Amount	Too Little	Don't Know	Missing	Total	
Please assess the level of fair housing outreach and education activity in the Commonwealth.	1	15	56	79	82	233	
Please assess the current level of fair housing testing in the Commonwealth.	0	12	40	98	83	233	

When asked about fair housing in the private and public sectors, 33 respondents indicated that there are impediments in the rental housing market, and 22 respondents indicated that there are impediments to fair housing in the real estate industry or the housing construction and design fields.

Table IV.36 Fair Housing in the Private Sector CNMI Total Fair Housing Survey							
Question	Yes	No	Don't Know	Missing	Total		
Do you know of any impediments to fair housin	g choice in t	hese areas in	the Commo	nwealth?			
The rental housing market? (Example: Refusing to rent based on religion or color.)	33	61	45	94	233		
The real estate industry? (Example: Only showing properties to families with children in certain areas.)	22	43	73	95	233		
The mortgage and home lending industry? (Example: Offering higher interest rates to women or racial minorities.)	17	48	74	94	233		
The housing construction or housing design fields? (Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.)	23	43	73	94	233		
The home insurance industry? (Example: Limiting policies and coverage for racial minorities.)	9	40	89	95	233		
The home appraisal industry? (Example: Basing home values on the ethnic composition of neighborhoods.)	13	44	80	96	233		
Any other housing services?	8	36	89	100	233		

Some 24 respondents indicated that there are barriers that limit access to government services, such as a lack of transportation. An additional 18 respondents indicated a barrier in housing construction standards.

Table IV.37 Fair Housing in the Public Sector CNMI Total Fair Housing Survey							
Question	Yes	No	Don't Know	Missing	Total		
Do you know of any impediments or bar	riers to fair ho	ousing choic	e in the Comi	monwealth reg	garding:		
Land use policies? (Example: Policies that concentrate multi-family housing in limited areas.)	12	49	67	105	233		
Zoning laws? (Example: Laws that restrict placement of group homes.)	6	46	75	106	233		
Occupancy standards or health and safety codes? (Example: Codes being inadequately enforced in immigrant communities.)	15	43	68	107	233		
Property assessment and tax policies? (Example: Lack of tax incentives for making reasonable accommodations or modifications for the disabled.)	9	40	78	106	233		
The permitting process? (Example: Not offering documentation to persons in protected classes.)	11	46	70	106	233		
Housing construction standards? (Example: Lack of or confusing guidelines for construction of accessible housing.) Neighborhood or community development	18	41	68	106	233		
policies? (Example: Policies that encourage development in narrowly defined areas of the community.)	14	42	71	106	233		
Do you know of any barriers that limit access to government services, such as a lack of transportation or employment services? Are there any other public administrative	24	44	59	106	233		
actions or regulations that act as barriers to fair housing choice?	11	38	76	108	233		

Of the 233 respondents, 13 indicated that they did know of any Commonwealth fair housing ordinance, regulation, or plan. Another four people stated that they were aware of any Commonwealth policies or practices for "affirmatively furthering fair housing."

Con					
Question	Yes	No	Don't Know	Missing	Total
Do you know of any Commonwealth fair housing ordinance, regulation, or plan in the CNMI?	13	63	48	109	233
Do you know of any Commonwealth policies or practices for "affirmatively furthering fair housing" in the CNMI?	4	62	58	109	233
Are there specific geographic areas in the Commonwealth that have fair housing problems?	12	21	90	110	233

G. ZONING AND CODE REVIEW

Saipan's zoning law was updated most recently in 2018. Its zoning law does include a definition of "dwelling unit", defining such a unit as a "room or group of rooms" that is designed to provide "living quarters for not more than one family." A "family", in turn, is defined as "one or more persons related by blood, marriage, or law occupying a dwelling unit and living as a single housekeeping unit." Given that dwelling units are nominally limited to a single family, there is the potential that these provisions may serve as a limitation on persons with non-traditional living arrangements; however, there is no provision explicitly limiting the number of people that may live in a dwelling unit.

The Saipan Zoning Code was also assessed for the presence or absence of provisions that may serve to promote or limit certain uses or types of housing. Mixed-use developments, or those which include residential and non-residential uses, are permitted in commercial and tourist-oriented areas, and are allowed under conditional-use permits in the Village Residential zoning district. "Institutional residential" uses, which include group homes and other types of supportive housing, are allowed only by conditional-use permit. Multifamily housing projects that are less than 48 feet in height are permitted in most zoning districts that allow residential development more generally. Multifamily projects that exceed that height generally require conditional use permits.

The zoning law does include the Americans with Disabilities Act Requirements of Title III of the Americans with Disabilities Act (ADA) Regulations and the ADA Standards for Accessible Design (28 CFR Part 36).¹⁸

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¹⁸ Saipan Zoning Law of 2018

SECTION V. FAIR HOUSING GOALS AND PRIORITIES

Overview

Title VIII of the 1968 Civil Rights Act, also known as the Federal Fair Housing Act, made it illegal to discriminate in the buying, selling, or renting of housing based on a person's race, color, religion, or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected characteristics. Federal fair housing statutes are largely covered by the following:

- 1. The Fair Housing Act,
- 2. The Housing Amendments Act, and
- 3. The Americans with Disabilities Act.

The purpose of fair housing law is to protect a person's right to own, sell, purchase, or rent housing of his or her choice without fear of unlawful discrimination. The goal of fair housing law is to allow everyone equal opportunity to access housing.

Assessing Fair Housing

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(e) (5) of the federal Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG)¹⁹, and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH). This was described in the Analysis of Impediments to Fair Housing Choice and a Fair Housing Planning Guide offering methods to conduct such a study was released in March of 1993.

In 2015, HUD released a new AFFH rule, which gave a format, a review process, and content requirements for the newly named "Assessment of Fair Housing", or AFH. The assessment would now include an evaluation of equity, the distribution of community assets, and access to opportunity within the community, particularly as it relates to concentrations of poverty among minority racial and ethnic populations. Areas of opportunity are physical places, areas within communities that provide things one needs to thrive, including quality employment, high performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes.

¹⁹ The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

The AFH would also include measures of segregation and integration and provide some historical context about how such concentrations became part of the community's legacy. Together, these considerations were then intended to better inform public investment decisions that would lead to amelioration or elimination of such segregation, enhancing access to opportunity, promoting equity, and hence housing choice. Equitable development requires thinking about equity impacts at the front end, prior to the investment occurring. That thinking involves analysis of economic, demographic, and market data to evaluate current issues for citizens who may have previously been marginalized from the community planning process. All this would be completed by using an on-line Assessment Tool.

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020. Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line Assessment Tool for local government program participants; and, the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI; and, encouraged jurisdictions to use them, if so desired.

Hence, the AI process involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, housing transactions, locations of public housing authorities, areas having racial and ethnic concentrations of poverty and access to opportunity. The development of an AI also includes public input, and interviews with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified fair housing issues/impediments.

In accordance with the applicable statutes and regulations governing the Consolidated Plan, the Northern Marianas Housing Corporation certifies that they will affirmatively further fair housing, by taking appropriate actions to overcome the effects of any impediments identified in the Analysis of Impediments to Fair Housing Choice and maintaining records that reflect the analysis and actions taken in this regard.

Overview of Findings

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, Commonwealth of the Northern Mariana Islands has identified a series of fair housing issues/impediments, and other contributing factors that contribute to the creation or persistence of those issues.

Table V.1, provides a list of the contributing factors that have been identified as causing these fair housing issues/impediments and prioritizes them according to the following criteria:

- 1. High: Factors that have a direct and substantial impact on fair housing choice
- 2. Medium: Factors that have a less direct impact on fair housing choice, or that the Northern Marianas Housing Corporation has limited authority to mandate change.
- 3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that the Northern Marianas Housing Corporation has limited capacity to address.

Table V.1 Contributing Factors Commonwealth of the Northern Mariana Islands					
Contributing Factors	Priority	Justification			
Insufficient affordable housing in a range of unit sizes	High	Some 20.3 percent of households had cost burdens in 2010. This is more significant for owner households with a mortgage, of which 31.2 percent have cost burdens. This signifies a lack of housing options that are affordable to a large proportion of the population.			
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the need of the growing elderly and disabled population, particularly as the population continues to age. The elderly population grew by 69.5 percent between 2010 and 2017, representing the fastest growing age group in the CNMI. In 2010, an estimated 57.4 percent of persons aged 75 and older had a disability. Disabilities were found at a greater rate on the Island of Rota, as seen in Maps IV.19 through IV.24.			
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.			
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education. This is also demonstrated in the lack of fair housing complaints in the CNMI.			
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit needed to access mortgages.			

FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND PROPOSED ACHIEVEMENTS

Table V.2 summarizes the fair housing issues/impediments and contributing factors, including metrics, milestones, and a timeframe for achievements.

Fair Housing Goal	Impediments to Fair Housing Choice/ Contributing Factors	Recommended Actions
Promote affordable homeownership and rental opportunities	Insufficient affordable housing in a range of unit sizes	Continue to promote homeownership and affordable rental opportunities in high opportunity areas with the use of CDBG and HOME funds. Over the next five (5) years: 260 rental units added 10 homeowner units added 100 rental units rehabilitated 10 homeowner housing units rehabilitated Record activities annually.
Promote community and service provider knowledge of ADA laws	Insufficient accessible affordable housing	Increase outreach and education for housing providers in the state, focusing on legal requirements concerning reasonable accommodation, in coordination with local disability advocate organizations. Record activities annually.
Increase outreach and education for housing providers in the Commonwealth	Lack of fair housing infrastructure Insufficient fair housing education Insufficient understanding of credit	Continue to conduct fair housing outreach and education targeting rental tenants, providing an overview of fair housing laws and examples of discrimination that housing consumers may encounter in the rental housing market. Continue to publicize the responsibilities of the Commonwealth's fair housing officer, a role currently filled by the Family Self-Sufficiency Program Coordinator of the Northern Marianas Housing Corporation, in print and online media, including the Housing Corporation website. Continue to promote education through website and online materials. Continue to fund homeownership counseling using HOME funds: 30 over five (5) years. Record activities annually.

SECTION VI. APPENDICES

A. ADDITIONAL PLAN DATA

Figure A.1 Response from HUD Representative to Request for Complaint Data

Northern Mariana Islands Personal Correspondence

From: Gums, Vicki A
To: Kristen Bennett

Subject: RE: Fair Housing Complaint data request Date: Friday, March 20, 2020 8:17:50 AM

Dear Ms. Bennett,

I received your request for Fair Housing Complaint data for the Northern Marianas Islands. Upon my search in our database, I found that no records exist for the time period January 1, 2015 to March 20, 2020. Thank you for your interest in the Department's Programs.

Please let me know if you have further questions.

Best, Vicki Gums

Vicki A. Gums
Program Analyst
Office of Fair Housing and Equal Opportunity
U.S. Department of Housing and Urban Development
One Sansome Street, Ste. 1200
San Francisco, CA 94104-4430
Telephone: (415) 489-6534 TTY: (415) 489-6564

Fax: (415) 489-6560 Email: vicki.a.gums@hud.gov

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HOUSING NEEDS ASSESSMENT SURVEY DATA: COMMONWEALTH OF NORTHERN MARIANA ISLANDS

Table Which areas of the Comm Marianas Islands do y Commonwealth of Noi Fair Housi	nonwealth of the Northern you wish to address? rthern Mariana Islands			
Community	Number of Respondents:			
Northern Islands Municipality 0				
Saipan	0			
Tinian	0			
Rota	Rota 0			
Commonwealth of Northern Mariana Islands 45				
Other	0			
Total	45			

Table VI.A.2 What is your primary role in the housing industry? Commonwealth of Northern Mariana Islands Fair Housing Survey				
Role	Total			
Advocate	6			
Appraisal	0			
Banking/Finance	1			
Construction/Development	3			
Insurance	0			
Law/Legal Services	0			
Local government	10			
Property Management	1			
Real estate	0			
Service Provider	6			
Other	6			
Missing	12			
Total	45			

Table VI.A.3 Are you a: Commonwealth of Northern Mariana Islands Fair Housing Survey			
Role	Total		
Homeowner	17		
Renter	13		
Other	8		
Missing 7			
Total 45			

Table VI.A.4 How familiar are you with Fair Housing Laws? Commonwealth of Northern Mariana Islands Fair Housing Survey		
Role	Total	
Not Familiar	15	
Somewhat Familiar	15	
Very Familiar	2	
Missing 13		
Total	45	

Table VI.A.5 Fair Housing Laws Commonwealth of Northern Mariana Islands Fair Housing Survey						
Question	Yes	No	Don't Know	Missing	Total	
Do you think fair housing laws serve a useful purpose?	23	0	10	12	45	
Do you think fair housing laws are difficult to understand or follow?	5	17	11	12	45	
Do you feel that fair housing laws are adequately enforced in the Commonwealth?	10	5	16	14	45	
Based on your knowledge of fair housing law, do you think that additional groups should be protected under the CNMI fair housing law?	8	3	20	14	45	
Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law. Do you know of any educational activities or training opportunities available to you to learn about fair housing laws?	9	7	16	13	45	
If you answered "yes" to the previous question, have you participated in fair housing activities or training? Fair housing testing is often used to	9	9	8	19	45	
assess potential violations of fair housing law. Testing can include activities such as evaluating building practices to determine compliance with accessibility laws or testing if some people are treated differently when inquiring about available rental units. Do you know of any fair housing testing of any sort in the Commonwealth?	3	17	11	14	45	

Com	Fair Houmonwealth of N	e VI.A.6 using Laws lorthern Marian using Survey	a Islands			
Question	Too Much	Right Amount	Too Little	Don't Know	Missing	Total
Please assess the level of fair housing outreach and education activity in the Commonwealth.	0	3	7	21	14	45
Please assess the current level of fair housing testing in the Commonwealth.	0	3	9	19	14	45

Table VI.A.7 Fair Housing in the Private Sector Commonwealth of Northern Mariana Islands Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Do you know of any impediments to fai	ir housing (choice in thes	se areas in th	e Commonwe	alth?
The rental housing market? (Example: Refusing to rent based on religion or color.)	5	16	10	14	45
The real estate industry? (Example: Only showing properties to families with children in certain areas.)	3	12	16	14	45
The mortgage and home lending industry? (Example: Offering higher interest rates to women or racial minorities.)	3	10	18	14	45
The housing construction or housing design fields? (Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.)	5	9	17	14	45
The home insurance industry? (Example: Limiting policies and coverage for racial minorities.)	1	7	22	15	45
The home appraisal industry? (Example: Basing home values on the ethnic composition of neighborhoods.)	2	10	19	14	45
Any other housing services?	1	7	21	16	45

Table VI.A.8 Fair Housing in the Public Sector Commonwealth of Northern Mariana Islands Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Do you know of any impediments or barr	iers to fair ho	ousing choice	e in the Com	monwealth reg	garding:
Land use policies? (Example: Policies that concentrate multi-family housing in limited areas.)	4	10	17	14	45
Zoning laws? (Example: Laws that restrict placement of group homes.)	2	10	18	15	45
Occupancy standards or health and safety codes? (Example: Codes being inadequately enforced in immigrant communities.)	4	8	19	14	45
Property assessment and tax policies? (Example: Lack of tax incentives for making reasonable accommodations or modifications for the disabled.)	2	10	19	14	45
The permitting process? (Example: Not offering documentation to persons in protected classes.)	1	12	18	14	45
Housing construction standards? (Example: Lack of or confusing guidelines for construction of accessible housing.)	4	10	17	14	45
Neighborhood or community development policies? (Example: Policies that encourage development in narrowly defined areas of the community.)	4	8	19	14	45
Do you know of any barriers that limit access to government services, such as a lack of transportation or employment services?	4	11	16	14	45
Are there any other public administrative actions or regulations that act as barriers to fair housing choice?	1	8	22	14	45

Table VI.A.9 Concluding Questions Commonwealth of Northern Mariana Islands Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Do you know of any Commonwealth fair housing ordinance, regulation, or plan in the CNMI?	3	12	14	16	45
Do you know of any Commonwealth policies or practices for "affirmatively furthering fair housing" in the CNMI?	2	11	16	16	45
Are there specific geographic areas in the Commonwealth that have fair housing problems?	3	5	21	16	45

HOUSING NEEDS ASSESSMENT SURVEY DATA: NORTHERN ISLANDS MUNICIPALITY

Table VI.B.1 Which areas of the Commonwealth of the Northern Marianas Islands do you wish to address? Northern Islands Municipality Fair Housing Survey			
Community	Number of Respondents:		
Northern Islands Municipality 2			
Saipan	0		
Tinian	0		
Rota	0		
Commonwealth of Northern 0 Mariana Islands			
Other	0		
Total	2		

Table VI.B.2 What is your primary role in the housing industry? Northern Islands Municipality Fair Housing Survey		
Role	Total	
Advocate	0	
Appraisal	0	
Banking/Finance	0	
Construction/Development	0	
Insurance	0	
Law/Legal Services	0	
Local government	0	
Property Management	0	
Real estate	0	
Service Provider	0	
Other	1	
Missing	1	
Total	2	

Table VI.B.3 Are you a: Northern Islands Municipality Fair Housing Survey			
Role	Total		
Homeowner	1		
Renter	1		
Other	0		
Missing	0		
Total 2			

Table VI.B.4 How familiar are you with Fair Housing Laws? Northern Islands Municipality Fair Housing Survey		
Role	Total	
Not Familiar	1	
Somewhat Familiar	1	
Very Familiar	0	
Missing	0	
Total	2	

Table VI.B.5 Fair Housing Laws Northern Islands Municipality Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws serve a useful purpose?	1	0	1	0	2
Do you think fair housing laws are difficult to understand or follow?	1	0	1	0	2
Do you feel that fair housing laws are adequately enforced in the Commonwealth?	1	0	1	0	2
Based on your knowledge of fair housing law, do you think that additional groups should be protected under the CNMI fair housing law?	0	0	2	0	2
Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law. Do you know of any educational activities or training opportunities available to you to learn	1	0	0	1	2
about fair housing laws? If you answered "yes" to the previous question, have you participated in fair housing activities or training? Fair housing testing is often used to	0	1	0	1	2
assess potential violations of fair housing law. Testing can include activities such as evaluating building practices to determine compliance with accessibility laws or testing if some people are treated differently when inquiring about available rental units. Do you know of any fair housing testing of any sort in the Commonwealth?	0	0	1	1	2

	Fair Hou Northern Isla	e VI.B.6 using Laws ands Municipalit using Survey	ty			
Question	Too Much	Right Amount	Too Little	Don't Know	Missing	Total
Please assess the level of fair housing outreach and education activity in the Commonwealth.	0	0	0	1	1	2
Please assess the current level of fair housing testing in the Commonwealth.	0	0	0	1	1	2

Table VI.B.7 Fair Housing in the Private Sector Northern Islands Municipality Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Do you know of any impediments to fai	ir housing (choice in thes	se areas in the	e Commonwe	alth?
The rental housing market? (Example: Refusing to rent based on religion or color.)	0	0	1	1	2
The real estate industry? (Example: Only showing properties to families with children in certain areas.)	0	0	1	1	2
The mortgage and home lending industry? (Example: Offering higher interest rates to women or racial minorities.)	0	0	1	1	2
The housing construction or housing design fields? (Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.)	0	1	0	1	2
The home insurance industry? (Example: Limiting policies and coverage for racial minorities.)	0	0	1	1	2
The home appraisal industry? (Example: Basing home values on the ethnic composition of neighborhoods.)	0	0	1	1	2
Any other housing services?	0	0	1	1	2

Table VI.B.8 Fair Housing in the Public Sector Northern Islands Municipality Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Do you know of any impediments or barr	iers to fair ho	ousing choice	e in the Com	monwealth reg	garding:
Land use policies? (Example: Policies that concentrate multi-family housing in limited areas.)	0	1	0	1	2
Zoning laws? (Example: Laws that restrict placement of group homes.)	0	1	0	1	2
Occupancy standards or health and safety codes? (Example: Codes being inadequately enforced in immigrant communities.)	0	0	1	1	2
Property assessment and tax policies? (Example: Lack of tax incentives for making reasonable accommodations or modifications for the disabled.)	0	0	1	1	2
The permitting process? (Example: Not offering documentation to persons in protected classes.)	0	0	1	1	2
Housing construction standards? (Example: Lack of or confusing guidelines for construction of accessible housing.)	0	1	0	1	2
Neighborhood or community development policies? (Example: Policies that encourage development in narrowly defined areas of the community.)	0	0	1	1	2
Do you know of any barriers that limit access to government services, such as a lack of transportation or employment services? Are there any other public administrative	0	0	1	1	2
actions or regulations that act as barriers to fair housing choice?	0	0	1	1	2

North	Table VI cluding Q nern Islands I Fair Housing	uestions Municipality			
Question	Yes	No	Don't Know	Missing	Total
Do you know of any Commonwealth fair housing ordinance, regulation, or plan in the CNMI?	0	0	1	1	2
Do you know of any Commonwealth policies or practices for "affirmatively furthering fair housing" in the CNMI?	0	0	1	1	2
Are there specific geographic areas in the Commonwealth that have fair housing problems?	0	0	1	1	2

HOUSING NEEDS ASSESSMENT SURVEY DATA: ROTA

Table VI.C.1 Which areas of the Commonwealth of the Northern Marianas Islands do you wish to address? Rota				
Fair Housing Survey				
Community	Number of Respondents:			
Northern Islands Municipality	0			
Saipan	0			
Tinian	0			
Rota	2			
Commonwealth of Northern Mariana Islands	0			
Other	0			
Total	2			

Table VI.C.2 What is your primary role in the housing industry? Rota		
Fair Housing Survey Role	Total	
Advocate	0	
Appraisal	0	
Banking/Finance	0	
Construction/Development	0	
Insurance	0	
Law/Legal Services	0	
Local government	0	
Property Management	1	
Real estate	0	
Service Provider	0	
Other	0	
Missing	1	
Total	2	

Table VI.C.3 Are you a: Rota Fair Housing Survey			
Role	Total		
Homeowner	1		
Renter	1		
Other	0		
Missing	0		
Total	2		

Table VI.C.4 How familiar are you with Fair Housing Laws? Rota Fair Housing Survey		
Role	Total	
Not Familiar	0	
Somewhat Familiar	0	
Very Familiar	1	
Missing	1	
Total	2	

Table VI.C.5 Fair Housing Laws						
Question	Fair Housing Yes	No No	Don't Know	Missing	Total	
Do you think fair housing laws serve a useful purpose?	1	0	0	1	2	
Do you think fair housing laws are difficult to understand or follow?	0	1	0	1	2	
Do you feel that fair housing laws are adequately enforced in the Commonwealth?	1	0	0	1	2	
Based on your knowledge of fair housing law, do you think that additional groups should be protected under the CNMI fair housing law?	0	1	0	1	2	
Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law. Do you know of any educational activities or training opportunities available to you to learn	0	1	0	1	2	
about fair housing laws? If you answered "yes" to the previous question, have you participated in fair housing activities or training? Fair housing testing is often used to	1	0	0	1	2	
assess potential violations of fair housing law. Testing can include activities such as evaluating building practices to determine compliance with accessibility laws or testing if some people are treated differently when inquiring about available rental units. Do you know of any fair housing testing of any sort in the Commonwealth?	0	1	0	1	2	

	Fair Ho	e VI.C.6 using Laws Rota using Survey				
Question	Too Much	Right Amount	Too Little	Don't Know	Missing	Total
Please assess the level of fair housing outreach and education activity in the Commonwealth.	0	0	1	0	1	2
Please assess the current level of fair housing testing in the Commonwealth.	0	0	1	0	1	2

	Table VI ing in the Rota air Housing	Private Se			
Question	Yes	No	Don't Know	Missing	Total
Do you know of any impediments to fa	ir housing o	choice in thes	e areas in the	e Commonwea	alth?
The rental housing market? (Example: Refusing to rent based on religion or color.)	0	1	0	1	2
The real estate industry? (Example: Only showing properties to families with children in certain areas.)	0	1	0	1	2
The mortgage and home lending industry? (Example: Offering higher interest rates to women or racial minorities.)	0	1	0	1	2
The housing construction or housing design fields? (Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.)	0	1	0	1	2
The home insurance industry? (Example: Limiting policies and coverage for racial minorities.)	0	1	0	1	2
The home appraisal industry? (Example: Basing home values on the ethnic composition of neighborhoods.)	0	1	0	1	2
Any other housing services?	0	1	0	1	2

Table VI.C.8 Fair Housing in the Public Sector Rota Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Do you know of any impediments or barri	ers to fair h	ousing choic	e in the Com	monwealth reg	garding:
Land use policies? (Example: Policies that concentrate multi-family housing in limited areas.)	0	1	0	1	2
Zoning laws? (Example: Laws that restrict placement of group homes.)	0	1	0	1	2
Occupancy standards or health and safety codes? (Example: Codes being inadequately enforced in immigrant communities.)	0	1	0	1	2
Property assessment and tax policies? (Example: Lack of tax incentives for making reasonable accommodations or modifications for the disabled.)	0	1	0	1	2
The permitting process? (Example: Not offering documentation to persons in protected classes.)	0	1	0	1	2
Housing construction standards? (Example: Lack of or confusing guidelines for construction of accessible housing.)	0	1	0	1	2
Neighborhood or community development policies? (Example: Policies that encourage development in narrowly defined areas of the community.)	0	1	0	1	2
Do you know of any barriers that limit access to government services, such as a lack of transportation or employment services? Are there any other public administrative	0	1	0	1	2
actions or regulations that act as barriers to fair housing choice?	0	1	0	1	2

	Table VI Icluding Q Rota Fair Housing	uestions			
Question	Yes	No	Don't Know	Missing	Total
Do you know of any Commonwealth fair housing ordinance, regulation, or plan in the CNMI?	1	0	0	1	2
Do you know of any Commonwealth policies or practices for "affirmatively furthering fair housing" in the CNMI?	1	0	0	1	2
Are there specific geographic areas in the Commonwealth that have fair housing problems?	0	1	0	1	2

HOUSING NEEDS ASSESSMENT SURVEY DATA: SAIPAN

Table VI.D.1 Which areas of the Commonwealth of the Northern Marianas Islands do you wish to address? Saipan Fair Housing Survey					
Community	Number of Respondents:				
Northern Islands Municipality 0					
Saipan	172				
Tinian	0				
Rota	0				
Commonwealth of Northern 0 Mariana Islands					
Other	0				
Total	172				

Table VI.D.2 What is your primary role in the housing industry? Saipan			
Fair Housing Survey	Total		
Advocate	25		
Appraisal	1		
Banking/Finance	2		
Construction/Development	6		
Insurance	2		
Law/Legal Services	4		
Local government	16		
Property Management	5		
Real estate	10		
Service Provider	21		
Other	41		
Missing	39		
Total	172		

Ar	le VI.D.3 e you a: Saipan busing Survey
Role	Total
Homeowner	40
Renter	96
Other	27
Missing	9
Total	172

Table VI.D.4 How familiar are you with Fair Housing Laws? Saipan Fair Housing Survey				
Role	Total			
Not Familiar	61			
Somewhat Familiar	39			
Very Familiar	12			
Missing	60			
Total	172			

Table VI.D.5 Fair Housing Laws Saipan						
Question	Fair Housing Yes	Survey No	Don't	Missing	Total	
Do you think fair housing laws serve a	66	10	Know 38	58	172	
useful purpose? Do you think fair housing laws are difficult to understand or follow?	21	56	36	59	172	
Do you feel that fair housing laws are adequately enforced in the Commonwealth?	23	40	46	63	172	
Based on your knowledge of fair housing law, do you think that additional groups should be protected under the CNMI fair housing law?	28	18	61	65	172	
Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law. Do you know of any educational activities or training opportunities available to you to learn about fair housing laws?	11	65	34	62	172	
If you answered "yes" to the previous question, have you participated in fair housing activities or training? Fair housing testing is often used to	8	45	21	98	172	
assess potential violations of fair housing law. Testing can include activities such as evaluating building practices to determine compliance with accessibility laws or testing if some people are treated differently when inquiring about available rental units. Do you know of any fair housing testing of any sort in the Commonwealth?	3	59	47	63	172	

Table VI.D.6 Fair Housing Laws Saipan Fair Housing Survey						
Question	Too Much	Right Amount	Too Little	Don't Know	Missing	Total
Please assess the level of fair housing outreach and education activity in the Commonwealth.	1	11	43	55	62	172
Please assess the current level of fair housing testing in the Commonwealth.	0	8	28	73	63	172

Table VI.D.7 Fair Housing in the Private Sector Saipan Fair Housing Survey						
Question	Yes	No	Don't Know	Missing	Total	
Do you know of any impediments to fa	ir housing o	choice in thes	e areas in th	e Commonwe	alth?	
The rental housing market? (Example: Refusing to rent based on religion or color.)	26	41	34	71	172	
The real estate industry? (Example: Only showing properties to families with children in certain areas.)	19	27	54	72	172	
The mortgage and home lending industry? (Example: Offering higher interest rates to women or racial minorities.)	13	34	54	71	172	
The housing construction or housing design fields? (Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.)	17	29	55	71	172	
The home insurance industry? (Example: Limiting policies and coverage for racial minorities.)	7	29	65	71	172	
The home appraisal industry? (Example: Basing home values on the ethnic composition of neighborhoods.)	10	30	59	73	172	
Any other housing services?	7	26	65	74	172	

Table VI.D.8 Fair Housing in the Public Sector Saipan Fair Housing Survey							
Question	Yes	No	Don't Know	Missing	Total		
Do you know of any impediments or barriers to fair housing choice in the Commonwealth regarding:							
Land use policies? (Example: Policies that concentrate multi-family housing in limited areas.)	8	35	47	82	172		
Zoning laws? (Example: Laws that restrict placement of group homes.) Occupancy standards or health and safety	4	32	54	82	172		
codes? (Example: Codes being inadequately enforced in immigrant communities.)	10	31	47	84	172		
Property assessment and tax policies? (Example: Lack of tax incentives for making reasonable accommodations or modifications for the disabled.)	7	27	55	83	172		
The permitting process? (Example: Not offering documentation to persons in protected classes.)	9	31	49	83	172		
Housing construction standards? (Example: Lack of or confusing guidelines for construction of accessible housing.)	12	27	50	83	172		
Neighborhood or community development policies? (Example: Policies that encourage development in narrowly defined areas of the community.)	8	31	50	83	172		
Do you know of any barriers that limit access to government services, such as a lack of transportation or employment services?	18	30	41	83	172		
Are there any other public administrative actions or regulations that act as barriers to fair housing choice?	8	27	52	85	172		

Table VI.D.9 Concluding Questions Saipan Fair Housing Survey								
Question	Yes	No	Don't Know	Missing	Total			
Do you know of any Commonwealth fair housing ordinance, regulation, or plan in the CNMI?	8	48	32	84	172			
Do you know of any Commonwealth policies or practices for "affirmatively furthering fair housing" in the CNMI?	0	49	39	84	172			
Are there specific geographic areas in the Commonwealth that have fair housing problems?	8	14	65	85	172			

HOUSING NEEDS ASSESSMENT SURVEY DATA: TINIAN

Table VI.E.1 Which areas of the Commonwealth of the Northern Marianas Islands do you wish to address? Tinian Fair Housing Survey						
Community	Number of Respondents:					
Northern Islands Municipality 0						
Saipan	0					
Tinian	12					
Rota	0					
Commonwealth of Northern Mariana Islands						
Other	0					
Total	12					

Table VI.E.2 What is your primary role in the housing industry? Tinian Fair Housing Survey						
Role	Total					
Advocate	5					
Appraisal	0					
Banking/Finance	1					
Construction/Development	0					
Insurance	0					
Law/Legal Services	0					
Local government	1					
Property Management	0					
Real estate	0					
Service Provider	1					
Other	3					
Missing	1					
Total	12					

Table VI.E.3 Are you a: Tinian Fair Housing Survey						
Role	Total					
Homeowner	5					
Renter	4					
Other	3					
Missing	0					
Total	12					

Table VI.E.4 How familiar are you with Fair Housing Laws? Tinian Fair Housing Survey					
Role	Total				
Not Familiar	6				
Somewhat Familiar	2				
Very Familiar	0				
Missing	4				
Total	12				

Table VI.E.5 Fair Housing Laws Tinian Fair Housing Survey							
Question	Yes	No	Don't Know	Missing	Total		
Do you think fair housing laws serve a useful purpose?	5	0	3	4	12		
Do you think fair housing laws are difficult to understand or follow?	2	1	5	4	12		
Do you feel that fair housing laws are adequately enforced in the Commonwealth?	0	1	7	4	12		
Based on your knowledge of fair housing law, do you think that additional groups should be protected under the CNMI fair housing law?	0	1	7	4	12		
Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law. Do you know of any educational activities or training opportunities available to you to learn	1	4	3	4	12		
about fair housing laws? If you answered "yes" to the previous question, have you participated in fair housing activities or training? Fair housing testing is often used to	1	5	1	5	12		
assess potential violations of fair housing law. Testing can include activities such as evaluating building practices to determine compliance with accessibility laws or testing if some people are treated differently when inquiring about available rental units. Do you know of any fair housing testing of any sort in the Commonwealth?	0	6	2	4	12		

Table VI.E.6 Fair Housing Laws Tinian Fair Housing Survey								
Question	Too Much	Right Amount	Too Little	Don't Know	Missing	Total		
Please assess the level of fair housing outreach and education activity in the Commonwealth.	0	1	5	2	4	12		
Please assess the current level of fair housing testing in the Commonwealth.	0	1	2	5	4	12		

Table VI.E.7 Fair Housing in the Private Sector Tinian Fair Housing Survey							
Question	Yes	No	Don't Know	Missing	Total		
Do you know of any impediments to fa	ir housing o	choice in thes	e areas in the	e Commonwe	alth?		
The rental housing market? (Example: Refusing to rent based on religion or color.)	2	3	0	7	12		
The real estate industry? (Example: Only showing properties to families with children in certain areas.)	0	3	2	7	12		
The mortgage and home lending industry? (Example: Offering higher interest rates to women or racial minorities.)	1	3	1	7	12		
The housing construction or housing design fields? (Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.)	1	3	1	7	12		
The home insurance industry? (Example: Limiting policies and coverage for racial minorities.)	1	3	1	7	12		
The home appraisal industry? (Example: Basing home values on the ethnic composition of neighborhoods.)	1	3	1	7	12		
Any other housing services?	0	2	2	8	12		

Table VI.E.8 Fair Housing in the Public Sector Tinian Fair Housing Survey							
Question	Yes	No	Don't Know	Missing	Total		
Do you know of any impediments or barr	iers to fair h	ousing choic	e in the Com	monwealth reg	garding:		
Land use policies? (Example: Policies that concentrate multi-family housing in limited areas.)	0	2	3	7	12		
Zoning laws? (Example: Laws that restrict placement of group homes.) Occupancy standards or health and safety	0	2	3	7	12		
codes? (Example: Codes being inadequately enforced in immigrant communities.)	1	3	1	7	12		
Property assessment and tax policies? (Example: Lack of tax incentives for making reasonable accommodations or modifications for the disabled.)	0	2	3	7	12		
The permitting process? (Example: Not offering documentation to persons in protected classes.)	1	2	2	7	12		
Housing construction standards? (Example: Lack of or confusing guidelines for construction of accessible housing.)	2	2	1	7	12		
Neighborhood or community development policies? (Example: Policies that encourage development in narrowly defined areas of the community.)	2	2	1	7	12		
Do you know of any barriers that limit access to government services, such as a lack of transportation or employment services? Are there any other public administrative	2	2	1	7	12		
actions or regulations that act as barriers to fair housing choice?	2	2	1	7	12		

Table VI.E.9 Concluding Questions Tinian Fair Housing Survey							
Question	Yes	No	Don't Know	Missing	Total		
Do you know of any Commonwealth fair housing ordinance, regulation, or plan in the CNMI?	1	3	1	7	12		
Do you know of any Commonwealth policies or practices for "affirmatively furthering fair housing" in the CNMI?	1	2	2	7	12		
Are there specific geographic areas in the Commonwealth that have fair housing problems?	1	1	3	7	12		