



COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS' PY 2020-2024 FIVE YEAR CONSOLIDATED PLAN AND PY 2020 ANNUAL ACTION PLAN

Submitted to the US Department of Housing and Urban Development by
the Northern Marianas Housing Corporation

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Executive Summary

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

1. Introduction

As a statutory requirement by HUD, the Commonwealth of the Northern Marianas Islands is hereby submitting its Five Year Consolidated Plan which covers Program Year 2020-2024 and its Annual Action Plan for Program Year 2015 (October 1, 2020 – September 30, 2024). The Plan outlines the planned uses and goals for CDBG, HOME, and ESG and also outlines the goals for Section 8 HCV and the Multifamily Programs. The programs address priority needs and goals for housing, services, and public facilities that serve low and moderate income populations.

The CNMI Government continues to be the designated recipient of the U.S. Dept. of Housing and Urban Development (HUD) Community Planning and Development grant funds for the islands of Saipan, Tinian, and Rota, all three inhabited islands comprising the CNMI. Governor Ralph DLG, the Responsible Entity of the CNMI, has designated the Northern Marianas Housing Corporation, an autonomous agency of the Government, to administer all HUD-funded programs. Consultations with various agencies were conducted and other state plans were reviewed and referenced in this document. In the past year, NMHC has consulted with various individuals, agencies, Mayors of all jurisdictions, and the Administration. NMHC gathered their input and found that similar goals and priorities were identified, some of which have changed due to the various events that took place in the past five years, notably the major disasters that have greatly impacted our island territories. First and foremost, the top goal of the NMHC and the CNMI is to promote and strengthen its fair housing efforts for citizens of the CNMI. The act was created on the principle that every American should have an equal opportunity to seek a place to live, without being afraid of discrimination due to factors outside their control. The goals and priorities identified by these various stakeholders share the same vision and that is to improve the quality of life for the citizens of the CNMI through projects which will provide job opportunities for persons with disabilities, and the low and moderate income population, provide economic opportunities for micro businesses, develop emergency shelter/transitional housing in the CNMI to provide adequate shelter in times of disasters, and to build temporary shelters for the most vulnerable populations, harden infrastructure to increase resilience, enhance public service activities in the CNMI, support projects that enhance the community, provide housing assistance for special needs, low-mod income population, harden public facilities and support fire and emergency medical services.

Within the past two years, the CNMI has experienced one of the most catastrophic events to hit our island territories. The perfect storm was illustrated almost two years ago when Super Typhoon Yutu struck the CNMI on October 24, 2018. The storm was considered the strongest typhoon to ever hit US soil since 1935. Yutu destroyed close to 5,000 homes, crippled the islands' infrastructure for months, and left thousands of residents scrambling for food, water, and shelter for months thereafter. Yutu caused close to \$900M in damage to the islands. With this said, we all can imagine the major impact it has caused to the CNMI's pre-existing housing crisis, its dwindling economy, and infrastructure, resulting in socio-economic disruptions, recent implementation of austerity measures, and slow economic growth. However, the CNMI remains resilient and with the help of the US Federal Government, such as FEMA and HUD, is recovering slowly but surely.

One significant disadvantage for the CNMI in writing this Plan, however, is the lack of information/resources available to address specific sections of this Plan. Unlike the (50) states, the CNMI is not included in the Comprehensive Housing Affordability Strategy (CHAS) and other comprehensive reports such as the American Community Survey (ACS). The CNMI must rely mostly on Census data to gather statistics and also resorted to using estimated numbers obtained from NMHC's internal database systems. Although it has been a constant struggle to reach an organizational capacity and a funding level to conduct certain surveys and assessments, the NMHC still strives to fulfill its priority goals and address priority needs of the CNMI citizens.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The CNMI outlined its goals and objectives for the next five years in a table found in SP-45. These goals and objectives were identified based on the needs assessment of the community and various agency State plans. The goals are:

- Job Creation/Retention – Promote employment opportunities for persons with disabilities ; Support micro businesses through loans or grants
- Emergency Shelter/Transitional Housing: Typhoon shelters; homeless shelters; Transitional Housing; domestic violence shelters; youth shelters
- Infrastructure Improvements- Streets and sidewalks, water and sewer improvements, utility lines, flood drainage systems
- Public Services – Healthcare; Recreational Programs; Services for senior citizens, Public safety services; Substance abuse programs
- Special Needs and Low-Mod income housing: Rehabilitation; New Construction/Acquisition/Energy Efficiency
- Community Enhancement- Operational support of facilities providing services to special needs populations, support the work of organizations that aim to reduce homelessness
- Public Facilities- Recreational facilities, sports facilities, fire stations (fire trucks, ambulances, emergency response equipment), youth centers, community centers
- Sustain Affordable Housing Stock
- Promote Fair housing

3. Evaluation of past performance

The CNMI has invested CPD funds which have benefited homeless persons, special needs populations, Section 8 housing residents, and low-and moderate-income individuals and families. The CNMI has injected about \$10M in CDBG funds to support the various CDBG community projects that have benefited the island's various populations. Over the past 5 years, through the CPD programs, the CNMI has contributed to the rehabilitation of public facilities which encourages community involvement and enhancement, purchase of fire protection and life-saving equipment, increased the fleet of Fire pumper trucks in the CNMI, and provided funding for debris removal on all three islands shortly after Super Typhoon Yutu, which was absolutely critical for CNMI residents, in order to prevent health and safety hazards. In addition to its public facilities and improvement projects, the CNMI has supported organizations providing various community enrichment services that aim to improve the living conditions of families living in impoverished neighborhoods and to provide rapid rehousing and homelessness prevention assistance to families who are literally homeless and at the verge of homelessness. In addition to the island's public facilities and improvement projects, the CNMI has injected about \$5M of HOME funds to construct affordable housing for eligible homebuyers, acquire and rehabilitate units and placed them back into service as affordable housing for eligible homebuyers, and provide low-interest or deferred loans to assist low-and very-low income homeowners to rehabilitate their homes and bring their primary residence to local building code standards. Lastly, the CNMI has utilized its Emergency Solutions Grant to provide rapid re-housing and homeless prevention for literally homeless or at-risk of homelessness households. For the past four years (2011 transition from the emergency shelter grant to the emergency solutions grant), the CNMI has injected about \$600K of ESG monies to homelessness and rapid re-housing services, in addition to implementing the Homeless Management Information System in the CNMI to better track and monitor HESG-assisted families .

4. Summary of citizen participation process and consultation process

The CNMI is required by the U.S. Department of Housing and Urban Development (HUD) to have a detailed Citizen Participation Plan which incorporates the island's policies and procedures for public involvement in the Consolidated Plan process and the use of Community Development Block Grant (CDBG), HOME Investment Partnerships Grant (HOME), and Emergency Solutions Grant (ESG) funds. The CNMI's Citizen Participation Plan is made available to the public. Additionally, regulation requires that this plan both provide for and encourage public participation, emphasizing involvement by low-and moderate-income people, especially those living in low-and moderate-income neighborhoods. According to the CNMI's Citizen Participation Plan, Annual Action and Consolidated Plans must be made available for a total of 30 days for the public to provide comment. In addition, the CNMI provides the general public a fifteen-day notice before informing them of the public hearings to be held on the islands of Saipan, Tinian, and Rota to discuss the Five Year Consolidated Plan and Annual Action Plan. Consultations, in preparation for the Consolidated Plan were conducted, to solicit for comments, input, and recommendations on the priorities, goals, and objectives for the next five years. NMHC conducted several, physical meetings with various agencies, individuals, Legislators, the Mayors of all CNMI jurisdictions, and its Board of Directors to accomplish such. See Appendix _____ for attendance sheets of the Consultation meetings. In addition, The ConPlan/AAP was made available from April 5, 2021 to April 12, 2021. See public notices- Appendix A and B. The notices for public hearings was published on April 5, 2021, and the virtual hearings were held on April 12, 2021. Also see Appendix _____ for the CNMI's Amended Citizen Participation Plan.

5. **Summary of public comments**
6. **Summary of comments or views not accepted and the reasons for not accepting them**
7. **Summary**

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency		
CDBG Administrator	Northern Marianas Housing Corporation	Community Planning and Development Division
HOME Administrator	Northern Marianas Housing Corporation	Community Planning and Development Division
HESG Administrator	Northern Marianas Housing Corporation	Community Planning and Development Division
Section 8/ Multi-Family Program Administrator	Northern Marianas Housing Corporation	Program and Housing Division

Table 1 – Responsible Agencies

Narrative

The Northern Marianas Housing Corporation is the lead agency responsible for preparing the NMHC Five Year Consolidated Plan for Program Years 2020-2024. The following individuals are responsible for HUD-funded programs:

Jesse S. Palacios, Corporate Director (Oversees all HUD-funded programs)

Zenie P. Mafnas, Deputy Corporate Director; Tricia B. Tenorio, Planner ; Jacob Muna, Office Manager/Procurement Officer (CDBG and HESG Programs)

Christopher Pangelinan, Mortgage and Credit Manager (HOME Program)

David Chargualaf- Program and Housing Division Manager (Section 8 HCV and Multifamily Programs)

The CNMI Government continues to be the designated recipient of the U.S. Department of Housing and Urban Development's (HUD) Community Planning and Development (CPD) grant funds for the CNMI Government. As the Responsible Entity for the CNMI, the Governor has delegated the Northern Marianas Housing Corporation (NMHC), an autonomous agency of the Government, to administer HUD CPD and Section 8/Multifamily Program funds to ensure compliance with program regulations.

Consolidated Plan Public Contact Information

Lead Contact(s): Jesse S. Palacios, Corporate Director; Zenie P. Mafnas, Deputy Corporate Director
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Saipan, MP 96950

PR-10 Consultation - 91.100, 91.200(b), 91.215(l)**1. Introduction****Summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies**

The CNMI works closely with various public and private agencies to address the needs of low-mod income persons and the special needs populations. Although the CNMI currently does not have a Continuum of Care Program in place, NMHC coordinates the delivery of services with agencies such as the Northern Marianas Protection and Advocacy Systems (NMPASI), Karidat Social Services, Department of Community and Cultural Affairs- Division of Youth Services, Council on Developmental Disabilities, Office of Vocational Rehabilitation, Center for Living Independently, Community Guidance Center, and the Department of Public Health. These agencies respond to the needs of youth, families, and adults. Needs may vary from employment, independent life skills, health and mental health, and financial needs. During the March 2019 CPD Briefing, government and non-profit organizations were invited to attend and were encouraged to provide input verbally, through a comprehensive survey, and an activity, so that NMHC could gather information, as to the type of needs that NMHC could potentially address within the next five years.

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

The CNMI currently does not have a Continuum of Care Program in place. However, In March of 2016, NMHC collaborated with government, private, and non-profit organization to form what is now called “the CNMI Homeless Prevention Coalition”. The NMHC in collaboration with the members of the newly formed Coalition started planning the first ever Point-In-Time (PIT) count for the CNMI. The logistics and planning of the PIT count was successful. The goal of the coalition is to obtain funding from HUD through the CoC program for the following: outreach services; case management services; job search services; rapid rehousing rental assistance; Homeless Management Information System (HMIS) software program; and referrals to mainstream resources (e.g. health services; Medicaid, etc.). More importantly, the Coalition would like to focus on providing rapid re-housing services to the homeless families and individuals. We anticipate to have the program participants obtain employment and maintain their housing at before exiting the program. In addition, NMHC participates in quarterly membership meetings with the Mental Health Planning Council, which includes members from a variety of social service providers such as the Northern Marianas Protection and Advocacy Systems, Inc., Karidat Social Services with Guma Esperansa (domestic violence shelter), Department of Community and Cultural Affairs with the Division of Youth Services Shelter (shelter for youth and children), and the Salvation Army. Since 2019, NMHC has directly administered the HESG Program and provides housing relocation and stabilization services for individuals in need of rapid re-housing and homelessness prevention assistance. NMHC also performs evaluations to ensure the assisted families are able to sustain their housing status after their 10-month assistance. Moreover, the The Guma Esperansa Domestic Violence

Shelter serves women and children who are victims of domestic violence, and the Division of Youth Services Shelter serves children and youth who are victims of child abuse and neglect (both populations are categorized as homeless due to their situations). Although there were veterans who availed of the ESG Program, there is no program available in the CNMI specifically for homeless veterans.

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

The CNMI does not have a CoC in place. When NMHC published the ESG Substantial Amendment in 2011, the agency consulted with the Karidat Social Services (Guma Esperansa Shelter), Northern Marianas Protection and Advocacy Systems Inc. (NMPASI), and the Department of Community and Cultural Affairs (Division of Youth Services). It was a unanimous decision to allocate the entire ESG funding to Karidat Social Services for rapid re-housing and homelessness prevention activities, therefore, transitioning ESG funding from shelter operations to financial assistance. Policies and procedures were also reviewed and were not amended since 2011. In December of every year, for the past five years, NMHC published a notice of public hearings for the funding availability of CPD funding. Public hearings are usually held in the month of February. In those discussions, NMHC provides a brief presentation on each program, including the Emergency Solutions Grant. Social service providers are encouraged to join the discussions and provide input as to where ESG funds should be allocated to and if current policies and procedures must be amended. The activities from the inception of the HESG Program remain the same, since there is a greater, positive impact in allocating to rapid re-housing and homelessness prevention activities. Although HESG funding is not used for the operations of shelters, the shelters continue to receive funds from other Grantor agencies to manage their programs efficiently and effectively. Appendix ____: Attendance Sheets of the various briefings conducted.

5. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities.

During the development of the Plan, NMHC consulted with a variety of agencies such as the Mayors' Offices of the islands of Saipan, Tinian, Rota, and the Northern Islands, the 21st Legislature (House and Senate), the Department of Labor, the Northern Marianas College-Community Development Institute, Northern Marianas Protection and Advocacy Inc., Council on Developmental Disabilities, Karidat Social Services, Governor's Office- Capital Improvement Project Division, Department of Public Works, Department of Public Health-Community Guidance Center and the Communicable Disease Division, and the Department of Community and Cultural Affairs, Public School System, Office of Planning and Development, Office of Grants Management, Northern Marianas Coalition Against Domestic Violence and Sexual Assault, American Red Cross, and the Saipan Chamber of Commerce. These consultations were conducted during various briefings held in FY 2019, in preparation for the Consolidated Plan. See Appendix ____: Attendance Sheets of the various briefings conducted. In the table below, details on the specific organizations consulted, who closely relates to the HUD-assisted programs, is provided.

1	Agency/Group/Organization	Karidat Social Services
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children
	How was the Agency/Group/Organization consulted and what are the outcomes of the consultation or areas for improved coordination?	Although the NMHC currently administers the HESG Program, the NMHC consults with Karidat Social Services on a frequent basis. Karidat Social Services is also engaged in discussing the effective use of Emergency Solutions Grant funds and what particular areas of the program can be improved to ensure that housing stability is achieved by the ESG-assisted household. Karidat Social Services also administers short-term rental assistance, through a DHHS grant, for homeless families who need a temporary place to stay, as they seek for permanent residence. They also provide food vouchers and donated clothing for those in need. In addition, the
2	Agency/Group/Organization	Department of Labor
	Agency/Group/Organization Type	Other government-local
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-Poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	NMHC consults with DOL, through the Workforce Investment Agency Division, on the type of programs available for low-mod income individuals, most of whom are participants in the HUD-assisted program. DOL is the only entity in the CNMI that provides training services such as the Individual Training Program, Program of Training Services (client may obtain a certification of completion in a particular field of study, a
3	Agency/Group/Organization	Mayors' Offices of Saipan, Tinian, and Rota
	Agency/Group/Organization Type	Other Government-Local
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-Poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Mayors of all (3) jurisdictions were consulted and they have demonstrated the need for mainly for public facilities, mainly recreational facilities, and infrastructure upgrades (to become more resilient) on the islands of Saipan, Tinian, and Rota, and just in the recent months, have expressed their thoughts on the need for typhoon shelters, in the times of disasters, and transitional housing for those in need of emergency shelter, as they seek for a permanent place to stay. These types of projects are being sought after to promote the local economy, health and wellness, youth activities, and public safety.
4	Agency/Group/Organization	American Red Cross

	Agency/Group/Organization Type	Services- Homeless – ADD MORE in IDIS
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	As the ARC was very instrumental in providing NMHC critical disaster data shortly after Super Typhoon Yutu, there was frequent discussions with the organization throughout the recovery process to date, on the types of assistance (both at the time of the disaster and for future mitigation) necessary to meet the unmet needs of the community. ARC expressed the need for typhoon shelters, transitional/emergency housing, and most especially, to increase the rental housing stock, as a majority of the population affected by the most recent disasters were renters. Over 50% major or destroyed homes were rental properties.
5	Agency/Group/Organization	Department of Public Health- Community Guidance Center
	Agency/Group/Organization Type	Other Government-Local
	What section of the Plan was addressed by Consultation?	Non-homeless special needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	NMHC consulted with the Community Guidance Center (CGC), a Division of the Department of Public Health, and have discussed about potential collaboration with NMHC and about funding assistance for the Systems of Care Program administered by CGC. Systems of Care is a coordinated network of community-based services and supports that is organized to meet the challenges of children and youth with serious mental health needs and their families. The consultation and coordination will help NMHC identify various needs amongst its system of care network and help us prepare for a Continuum of Care implementation, if approved by HUD.

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

The CNMI did not prohibit any agency types from participating in the development of this Plan.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Community Services Block Grant 2019 State Plan	Department of Community and Cultural Affairs	The goals of the State Plan include the continued support of activities designed to assist low income families and individuals, homeless families and individuals, and elderly low income individuals and families.
Workforce Innovation and Opportunity Act (FY 2020-2023)	Department of Labor- Workforce Investment Agency	The goals of the State Plan is the continuous improvement of job, education and training services through collaborative partnerships with government agencies, private businesses, and CNMI workers to fully recognize the importance of education, training, and economic development, and in turn, help the low income family and individual become self-sufficient.
CNMI Four Year State Plan on Aging 2015-2019	CNMI Office on Aging	The goals of the State Plan address the needs of island's elderly population to include public facilities and improvements, housing, and services to such populations.
Northern Marianas Office of Vocational Rehabilitation State Plan for FY 2018 (most recent Plan)	Office of Vocational Rehabilitation	The goals of the State Plan address the special needs of persons with disabilities who are seeking employment to achieve independence and self-sufficiency.
CNMI Council on Developmental Disabilities State Plan Amendment for FY 2017-2021	CNMI Council on Developmental Disabilities	The goals of the Strategic Plan address the housing and supportive service needs of persons with disabilities.
Smart, Safe, Growth Guidance for the CNMI – November 2018	CNMI Office of Planning and Development	Smart, Safe Growth (SSG) is a set of development strategies focused on improving the resiliency of the built environment. Through SSG, Pacific Islands governments work to develop communities that maximize public health and safety, provide economic opportunity and life-style choices, and that can withstand changes in climate and extreme weather events to reduce societal and economic burdens of recovery.

Northern Marianas Housing Corporation PHA 5-Year Plan and Annual Plan	Northern Marianas Housing Corporation	The goals of the Strategic Plan address the needs of Section 8 HCV and Multi-Family Program residents.
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Table 2 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

The CNMI coordinated with the Mayors of all CNMI jurisdictions, the 21st CNMI Legislature, the 21st Senate, various government agencies, non-profit organizations, by discussing the various community needs in the community to include those of homeless the persons, non- homeless special needs persons, and public housing residents. Relevant State plans were reviewed to gather information to substantiate the priorities and goals of this Consolidated Plan. Efforts were made to identify the needs of the island’s varying population. Information obtained in this Plan was derived from various State Plans, consultation with various groups and agencies, and the U.S. Census Bureau. This Plan will be made available for public review and comment from April 2nd to April 9, 2021. The public is encouraged to submit oral or written comments which must be received the Northern Marianas Housing Corporation no later than 4:30 p.m., April 9, 2021. A virtual hearing will be held on April 7, 2021, to inform the public about this Plan. NMHC will also solicit for comments at this virtual hearing.

Narrative (optional):

PR-15 Citizen Participation

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

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)

Table 3 – Citizen Participation Outreach

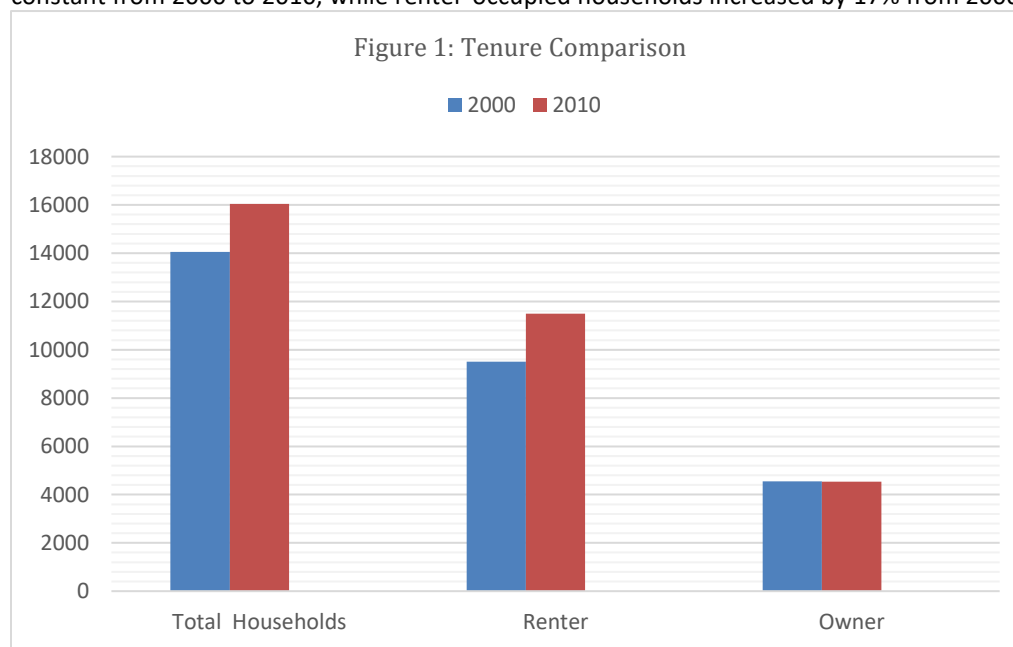
****Pending** Section will be inputted upon the expiration of the comment period on July 30, 2015**

NA-05 Overview

Needs Assessment Overview

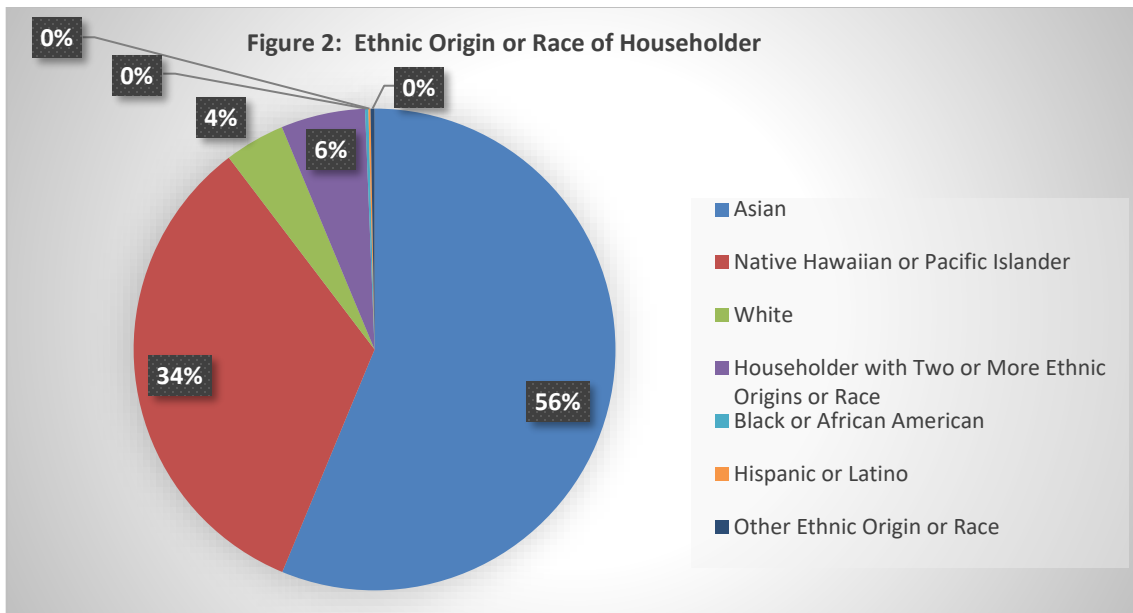
The CNMI is located in the Western Pacific comprising of a chain of 14 islands, and which a total of 3 islands are inhabited- Saipan, Tinian, and Rota. The island of Saipan is measured at 44.55 square miles and is divided into 30 villages – Achugao, As Lito, As Matuis, As Perdido, As Teo, As Terlaje, Capitol Hill, Chalan Kanoa, Chalan Kiya, Chalan Lau, Chalan Piao, China Town, Fina Sisu, Dan, Garapan, Gualo Rai, Kagman (I, II, III), Kannat Tabla, Kobleville, Lower Base, Marpi, Navy Hill, Oleai, Papago, Sadog Tasi, San Antonio, San Roque, San Vicente, Susupe, and Tanapag. The island of Tinian is measured at 39 square miles and its main village is San Jose. The island of Rota is measured at 83 square miles and is divided into 2 villages- Sinapalo and Song. The island of Saipan, capital of the CNMI, holds 89% of the CNMI's total population. Eight percent of Saipan's entire population reside in the village of Garapan, located in the central part of the island.

The population in the CNMI decreased by 22% from the last decennial Census in 2000 bringing the population total to 53,883. As per the 2010 Census, the median income in the CNMI is \$19,958 which decreased by 13% from the 2000 Census. As per the 2010 Census, the total number of households increased by 12% from the 2000 Census. Figure 1 demonstrates that in 2010, 71% are renter households, while 29% are owner households. Of the 4,537 owner households, 28% are still paying a mortgage or loan. The number of owner-occupied households remained constant from 2000 to 2010, while renter-occupied households increased by 17% from 2000 to 2010.

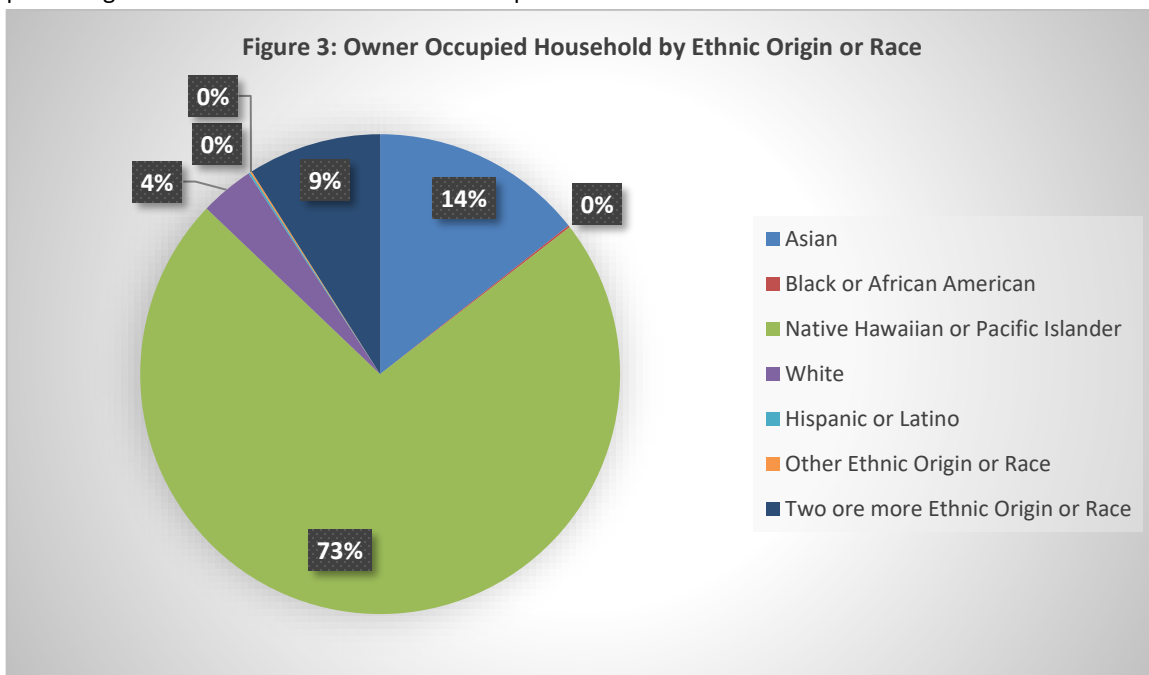


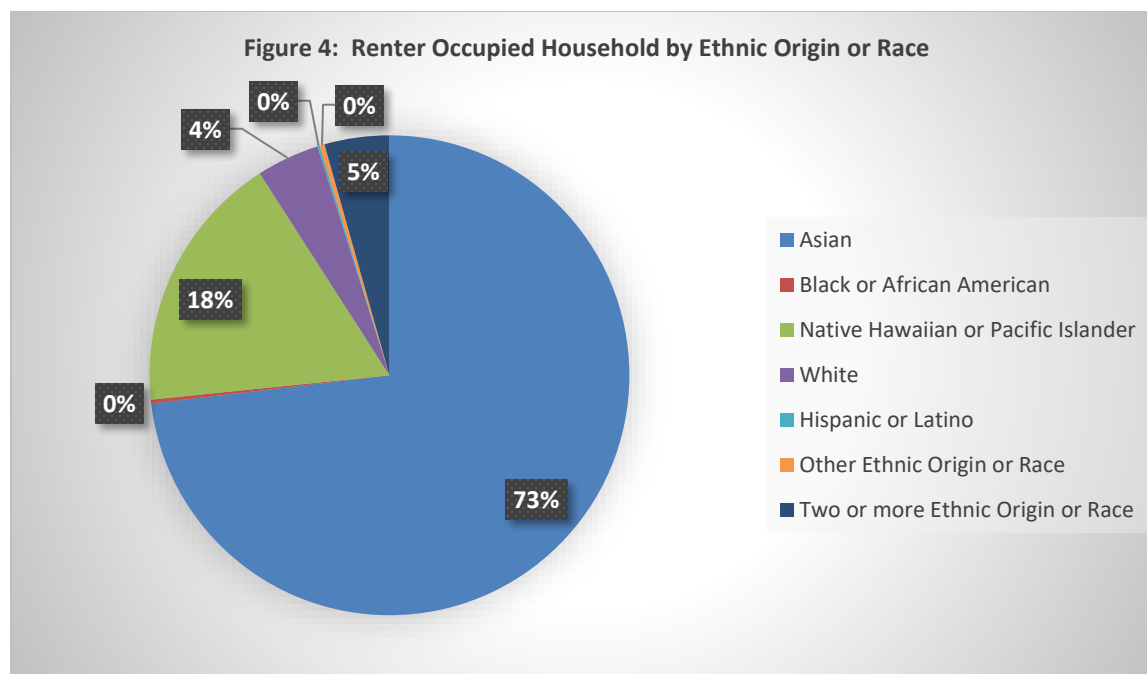
Data Source: US Census Bureau, 2010, Tenure by Household Type

Although there was a decrease in the population, all racial groups stayed relatively the same. The Asian population continue to account for slightly more than 50% of the island's households (See Figure 2).



The following two figures provide a visual picture of the percentage of tenure type households by ethnic origin or race (See Figure 3 & 4). These figures are based on the 2010 Census. The figures demonstrate that a majority of owner-occupied units are of Native Hawaiian or Pacific Islander descent, and the same majority percentage are of Asian descent in renter-occupied units.





According to the US Census 2010, a householder refers to “the person (or one of the people) in whose name the housing unit is owned or rented (maintained). The person designated as the householder is the "reference person" to whom the relationship of all other household members, if any, is recorded.” The significant changes are evident in the householder’s age. The CNMI saw a 53% decrease in householders in owner- occupied units between the ages of 25-34 and a 39% decrease in householders in renter-occupied units with the same age range. Householders within the 45-54 age range increased by 52% in renter-occupied units, while householders in owner-occupied units within the same age range remained steady since 2000 to 2010. There was also a 59% increase in householders whose age ranged from 65-74 years old in renter-occupied units, while there was a 29% increase in householders within the same range in owner-occupied units. As with the elderly population, for those ages 75-84, there was a 50% increase in householders since 2000 and a 31% increase for those 85 and over in owner-occupied units. For the renter-occupied units, there was an increase 36% increase in householders’ ages75-84, and a 50% increase in householders ages 84 and over.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

In this section, the CNMI assessed the housing needs of the community based on income level, tenure type, household type, and by housing problems, including housing cost burden, overcrowding and substandard housing conditions. Income levels were determined based on HUD's FY 2015 Income Limits and were further narrowed down to household size. HUD identifies the income category based on household size and household income. For example, a three-person household who reported to earn less than \$16,750 during the 2010 Census, will fall under HUD's extremely-low income category, or 30% AMI. Tenure type is defined as households who are renting, own the house but paying mortgage, rent free, or own the house free and clear. Household types are defined further by small or large family households, households with children, single-person households, unrelated households, and elderly households. Households identified with a housing cost burden were those with housing costs that was greater than 30% of their income.

Demographics	Base Year: 2010	Most Recent Year: 2000	% Change
Population	53,883	69,221	-22%
Households	16,035	14,055	12%
Household Median Income	\$19,958	\$22,898	-13%

Data Source: US Census Bureau 2000, 2010, CNMI

Table 4 - Housing Needs Assessment Demographics

Breakdown for the following categories for the HUD Area Median Family Income [HAMFI] are not available through the Comprehensive Housing Affordability Strategy (CHAS) data sets for the NMI: >0-30% >50-80% >80-100% >100%

Related data gathered for analysis from the U.S. Census Bureau, 2010 Census for the CNMI:

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	3,990	4,042	2,386	1,554	4,063
Small Family Households *	3,567	3,326	1,983	1,322	3,655
Large Family Households *	423	716	403	232	408
Household contains at least one person 62-74 years of age	128	128	94	70	324
Household contains at least one person age 75 or older	31	54	44	26	84
Households with one or more children 6 years old or younger *	640	668	372	264	477

* the highest income category for these family types is >80% HAMFI

Table 5 - Total Households Table

Disaster Recovery Data Extracted from the CNMI's CDBG-DR Action Plan: The Commonwealth of the Northern Mariana Islands (CNMI) compiled assessment data utilizing local and federal resources, including information from FEMA, HUD, SBA, and other federal and local agencies and organizations. This needs assessment includes specific details about unmet needs within the eligible and most impacted and distressed communities.

A comprehensive needs assessment was conducted in accordance with HUD guidance. NMHC reached out to government and non-profits entities to solicit priority projects. These activities, programs, and projects were then evaluated for their connections to short- and long-term recovery efforts. Housing projects were based on FEMA, Census, and American Red Cross data for single and multi-family housing. A scoring criterion will be used for infrastructure. The needs assessment provided allocation to all 3 project types (Housing, Infrastructure, and Economic Development) and projects for most impacted and distressed areas. Considerations for housing also included infrastructure and economic development activities that support housing.

Under DR 4396, FEMA approved 395 applications totaling \$1,011,549.70 for Individual Assistance with an obligation of \$3,833,508.47 for Public Assistance Grants. Unfortunately, a little over a month later, the Super Typhoon created even more devastation and impacts across the Islands. Under DR 4404, FEMA approved 6,958 applications totaling \$41,465,716.52 for Individual Assistance with an obligation of \$169,472,960.95 for Public Assistance Grants. All areas of Saipan, Tinian, and Rota were designated by FEMA for IA and PA funding as demonstrated by the maps below. The damages from both Typhoons make it one of the costliest if not the costliest events in the Commonwealth's history. As all the islands were impacted, everyday life and tourism came to a standstill.

*Note: Of the 14 Commonwealth Islands shown in the map above, the Islands of Saipan, Tinian, and Rota are the ones with principal inhabitants and are eligible for CDBG-DR funding.

The Islands of Saipan and Tinian were designated as Most Impacted Areas by HUD's most impacted areas formula with the majority of the population residing on Saipan. The entire islands of Saipan and Tinian were most impacted by the storm and where the most needs were identified post-storm. The CNMI concurs with HUD that Saipan and Tinian should be designated as the most impacted and distressed areas. Therefore, there is no "State" identified most impacted or distressed areas that differ from HUD.

The need for the Islands is significant and the HUD allocation of CDBG-DR funds will address a portion of the needs. To demonstrate the unmet needs, the CNMI is utilizing the best available data from the U.S. Census, FEMA, SBA, and other sources. The Preliminary Damage Assessment Report from FEMA used to determine the major disaster declaration indicates that over 700 residences were impacted with less than 6 percent of the residences insured. To support the needs assessment data, the American Red Cross estimated that over 51,000 persons and over 19,000 households were impacted by wind. The damage from wind severely impacted communication, power, and transportation. The estimated rainfall over the Islands during the storm was 6 to 9 inches causing flooding in low lying areas.

Below is a summary of the total unmet need by category and demonstrates how the CNMI will allocate funds based on those unmet needs. The CNMI allocated approximately 46 percent towards a variety of housing activities such as rehabilitation, reconstruction, new construction, and homeownership. Infrastructure is utilizing approximately 43 percent of the allocation and will fund major public facilities that were severely impacted by the storms. Economic Development is also addressed with approximately 4 percent of the funds allocated to support job and business stabilization and retention.

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

Table 6 – Housing Problems Table

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing – Lacking complete plumbing or kitchen facilities	753	596	212	89	1650	143	121	89	54	407
Severely Overcrowded – With >1.51 people per room (and complete kitchen and plumbing)	258	478	246	128	1110	30	62	69	59	220
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	249	439	297	171	1156	45	85	86	91	307
Housing cost burden greater than 50% of income (and none of the above problems)	1148	628	186	49	2011	53	69	56	35	213
Housing cost burden greater than 30% of income (and none of the above problems)	186	205	73	33	497	3	8	18	15	44
Zero/negative Income (and none of the above problems)	0	0	0	0	0	0	0	0	0	0

Data Source: U.S. Census Bureau, 2010 Census for the CNMI

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	2,719	2,823	1,560	900	8,002	375	502	525	511	1,913
Having none of four housing problems	2,212	1,906	1,017	601	5,736	300	355	370	361	1,386
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

Table 7 – Housing Problems 2

Data U.S. Census Bureau, 2010 Census for the CNMI

Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	186	205	73	464	24	35	27	86
Large Related	1,148	628	186	1,962	202	127	69	398
Elderly	90	87	48	225	69	95	90	254
Other	0	0	0	0	0	0	0	0
Total need by income	1,424	920	307	2,651	295	257	186	738

Table 8 – Cost Burden > 30%

Data Source: U.S. Census Bureau, 2010 Census for the CNMI

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	149	164	58	371	19	28	22	69
Large Related	918	502	149	1570	162	102	55	318
Elderly	72	70	38	180	55	76	72	203
Other	0	0	0	0	0	0	0	0
Total need by income	1139	736	246	2121	236	206	149	590

Table 9 – Cost Burden > 50%

Data U.S. Census Bureau, 2010 Census for the CNMI

Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	653	1,145	635	346	2,779	136	214	205	183	738
Multiple, unrelated family households	352	618	299	152	1,421	71	98	104	80	353
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	1,005	1,763	934	498	4,200	207	312	309	263	1,091

Table 10 – Crowding Information – 1/2

Data Source: U.S. Census Bureau, 2010 Census for the CNMI

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	2,941	2,984	1,530	7,455	518	623	614	1,755

Table 11 – Crowding Information – 2/2

Describe the number and type of single person households in need of housing assistance.

Current availability of data does not indicate the exact number and type of households in need of housing assistance, but related data gathered for analysis from the U.S. Census Bureau for the 2010 Census for the CNMI does provide a basis for an approximation for such information as that of household size (*see Table 6 – Total Households Table*).

From the 2010 Census data, the CNMI's total housing units equal 20,850. Out of the total, there were 16,035---or 77 percent---that were considered "occupied housing units". Based on that figure, it is clear that a majority of the units in the CNMI are occupied.

Breakdown between small and large family households indicate that 82 percent are small family households and 18 percent are large family. The data further indicates that the CNMI's population in occupied housing units total to 52,312 of which, 18,844 are living in owner-occupied units and a majority, or 33,468 are living in renter-occupied housing units.

Current housing data has not been available due to delays in statistical information from the U.S. Census for the 2020 Census for the CNMI. As of this analysis, new information has yet to be published; this is mainly due to the current COVID-19 pandemic that has affected the gathering and compilation of data within the past year.

From prior analysis and information obtained, the breakdown between small and large family households indicate that 82 percent are small family households and 18 percent are large family. The data further indicates that the CNMI's population in occupied housing units total to 52,312 of which, 18,844 are living in owner-occupied units and a majority, or 33,468 are living in renter-occupied housing units.

Analysis of the household totals and sizes relative to the CNMI's Area Median Family Income (AMFI), estimated at \$39,000.00 according to the 2010 U.S. Census data for owner-occupied households, show that the majority of the households are within 0-30% and 30-50% range. An estimated 52% of small family households (7,000 total); and 55% of large family households (1,200 total) are living within 50% of the AMFI.

Based on the analysis of the number of households data as derived from Table 6, it can be concluded that a majority of CNMI households in need of housing assistance are the extremely low-income (0-30% AMFI) to moderate-income families (>30-50% AMFI), both small and large household sizes.

Important statistical data that will be used throughout this analysis as extracted from the 2010 U.S. Census for the CNMI are the following:

HOUSING OCCUPANCY:

Total Housing Units = 20,850

Occupied housing units = 16,035

Population in occupied housing units = 52,312

Average household size = 3.26

Median Family Income = \$22,455

Mean Family Income= \$34,580

Vacant housing units = 4,815

Homeowner vacancy rate (percent) = 10.1

Rental vacancy rate (percent) = 18.5

HOUSING TENURE:

Occupied housing units = 16,035

CNMI Median Household Income= \$39,032

CNMI Mean Household Income (Owner + Renter) = \$31, 463

Owner-occupied housing units = 4,537

Population in owner-occupied housing units = 18,844

Average household size of owner-occupied = 4.15

Renter-occupied housing units = 11,498
Population in renter-occupied housing units = 33,468
Average household size of renter-occupied housing = 2.91

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Note: NMHC gathered data up until FY 2019, as NMHC started the drafting of its Five Year Consolidated Plan in March 2020. The pre-applications for Section 8 Programs does not ask for the applicants' information with regards to whether they are victims of domestic violence, dating violence, sexual assault or stalking; however, NMHC gathered statistical data (FY 2015-2019) from Guma Esperansa, the only domestic violence shelter on island, and from FY 2015-2019, a total of 368 women and 241 children were housed. The HESG Program defines those living in a shelter as being at risk of homelessness; therefore, NMHC will use the FY 19 stats to estimate the number of families in need of housing assistance. In 2019, 65 families who were victims of domestic violence were in need of housing assistance.

The HCVP Program, with a waiting list of 284 households, includes 41 families with a member or members with a disability. In the Multifamily Program, with a waiting list of 351 households, 24 families are with a member or members with a disability.

What are the most common housing problems?

Housing problems in the CNMI are quite disproportionate across the Area Median Income (AMI) index, as well as, within each category or tenure.

Statistical analysis derived from Table 7 and 8, Housing Problems Tables, indicate an estimated 1,650 substandard housing lacking complete plumbing or kitchen facilities for renter-occupied units. From this figure, over 80 percent of the housing units in this category fall burden to families who are within the 50 percent AMI. For owner-occupied units, an estimated total of 407 households with substandard housing lacking complete plumbing or kitchen facilities; of which, 65 percent are within the 50 percent AMI.

Overcrowding is another common housing problem among the low and moderate-income households in comparison to the middle and upper income households. Estimated figures for units that house extremely-low, low, and moderate-income families with more than 1.5 people per room, total to 1,424; which translates to 63 percent for this category. Middle and upper income households, on the other hand, are less susceptible to this housing problem with a lesser 37 percent. Nonetheless, overcrowding has been a problem in the CNMI as evident by statistics gathered by the 2010 U.S. Census where the average household size is 3.26 among occupied housing units. Average household size (3.26) is based on the population in occupied housing units (52,312) divided by the number of occupied housing units (16,035). Further analysis in regards to overcrowding may suggest a close correlation to family size as opposed to income category where overcrowding has become more prevalent among large family households (see Table 7).

Moreover, housing cost burden greater than 30 percent and 50 percent of income is highly evident among the low-income to moderate-income household (see Table 7). The disparity gap between the two income categories among renters and owner-occupied households is quite high. It is estimated that more than 80 percent of low to moderate income families incur housing costs that are greater than 50 percent of their income as opposed to the lower 20 percent for the middle to upper income family households. According the 2010 U.S. Census statistics, the estimated total count for households in the CNMI who are incurring housing costs that are greater than 50 percent of income equals to 2,700; and a staggering 2,300 or approximately 85 percent of the total are considered extremely low to middle income family households.

From the above discussion and analysis among the three main housing problems of substandard housing, overcrowding, and housing cost burden that we can therefore conclude that households in the CNMI face each kind of problem one way or the other, but it is evident that the extremely low income to middle income households are more exposed to increases in housing cost. And, with a high 85 percent of extremely low to middle income households in this type, it becomes clear that the most common housing problems in the CNMI are the prevalence of substandard housing where there is a lack of complete plumbing or a kitchen facility; and the burden associated with related housing costs. It must also be noted that this analysis may be skewed from the actual numbers, pending the new census statistical data for 2020.

Are any populations/household types more affected than others by these problems?

In analyzing the 2010 statistical data, it becomes evident that CNMI's households who are most affected are the extremely low income to middle income families. This result could be attributed by the inability for families to adequately save to service housing problems, such as those related to plumbing, electrical, and kitchen facilities.

Overcrowding results can be attributed to the lack of disposable income and funds to expand or extend units to provide for improve housing space and bedroom sizes for all those who are household members. This problem of overcrowded homes is estimated to continually rise, possibly at a slower rate, but as the CNMI population rebounds to increasing its residential areas and coupled by the continual increases in goods and services, as well as overall price increases in materials; the CNMI will need to reassess how to better handle the housing problems that currently exist so as to help prevent future problems from perpetuating.

Further analysis on extremely low-income households as indicated from Table 8, from the 2010 U.S. Census statistics (households with one or more severe housing problems), clearly shows that family households that fall within 0-30% of the AMI are the predominant household income group who are mainly affected as compared to others, such as the middle to upper income categories. This is especially high among renters, and could be due in part to the relatively large number of renter households as compared to owner households. Looking at the numbers for the extremely low-income households (0-30% of the AMI), it is estimated that 34 percent; or 2,719 of the total 8,002 renter households, have at least one or more of the four housing problems. On the other hand, owner-occupied households show a relatively equal distribution between 20-30 percent across household income categories.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

In the CNMI, extremely low income and the very low income households are experiencing the most severe housing problems and are considered a major segment of the household population. Within the extremely low to very low households, are families that may include the elderly, persons with special needs, and therefore are counted among family households needing housing assistance due to low incomes and physically inadequate housing conditions. Because these families are experiencing major hardships and are at risk of being homeless, it can be considered as an "at-risk" group.

The CNMI started the Point in Time Counts in 2017 and have continued with the count to date. As a result, The CNMI is has focused its attention and have strengthened its assessment methods to address the problems of homeless and persons at risk of homelessness. As such, NMHC continues to provide needed services and funding assistance, such as the Homeownership Investment Partnerships (HOME) Program to assist qualified low income families in the community with a safe, decent, sanitary, and affordable home, in addition to the Emergency Solutions Grant (HESG) Program which provides funds for services specifically programmed to address homelessness, as well as implementing preventative measures to help individuals or families who are at risk of being homeless.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Housing cost burdens placed on the extremely low income households are more likely to experience instability and at risk of being homeless. Based on estimates derived from the 2010 U.S. Census (see Tables 9 & 10), large families that fall within the 0-30% AMI with cost burden greater than 30 percent and 50 percent are at risk. Housing affordability in the CNMI is dependent on the size of the family, total household income, and property location. The larger the family, or household size, and the lesser of a total income, results in a heavier burden being placed on a family to sustain.

In the CNMI, it is estimated that 350 lower income owner-occupant households are currently experiencing excessive monthly housing cost burdens, due to mortgage payments and high utility costs. The case is also evident among renter-occupant households as it is estimated that at least 2,000 are being affected by monthly rental cost burdens. It becomes clear that there is a high percentage of large family households in the CNMI who have high rent payments and utility costs. These are families that fall within the 0-30% AMI group and are experiencing costs that are more than 50 percent of their total household income.

In addition to the above characteristics, close to 45% of the CNMI homes' roofs were either made out of tin or wood, which did not withstand the 200+MPH winds of Super Typhoon which made landfall in October 2018. According to American Red Cross data, there were close to 5,000 homes that were either major or completely destroyed. As a result, many CNMI households were living in FEMA provided tents, as they waited for FEMA or SBA assistance. Unfortunately, close to 10% of those households still live in the tents today, which causes instability in the household and an increased risk of homelessness.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction**0%-30% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,320	2,136	0
White	93	85	0
Black / African American	5	5	0
Asian	1,299	1,196	0
American Indian, Alaska Native	154	142	0
Pacific Islander	766	705	0
Hispanic	3	3	0

Table 12 - Disproportionately Greater Need 0 - 30% AMI

Data U.S. Census Bureau, 2010 Census for the CNMI

Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3325	1,922	0
White	133	77	0
Black / African American	7	4	0
Asian	1862	1,076	0
American Indian, Alaska Native	221	128	0
Pacific Islander	1097	634	0
Hispanic	5	3	0

Table 13 - Disproportionately Greater Need 30 - 50% AMI

Data Source: U.S. Census Bureau, 2010 Census for the CNMI

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2085	1,179	0
White	83	47	0
Black / African American	5	3	0
Asian	1168	660	0
American Indian, Alaska Native	138	78	0
Pacific Islander	688	389	0
Hispanic	3	2	0

Table 14 - Disproportionally Greater Need 50 - 80% AMI**Data** U.S. Census Bureau, 2010 Census for the CNMI**Source:**

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room,
4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1411	818	0
White	56	33	0
Black / African American	3	2	0
Asian	790	458	0
American Indian, Alaska Native	94	54	0
Pacific Islander	466	270	0
Hispanic	2	1	0

Table 15 - Disproportionally Greater Need 80 - 100% AMI**Data** U.S. Census Bureau, 2010 Census for the CNMI**Source:**

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room,
4. Cost Burden greater than 30%

Discussion

An analysis of the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole, and from estimated data calculated for tables 12 to 15, it becomes evident that the Asian ethnic population in the CNMI is the dominant group and most likely in greater need. The Pacific Islander ethnic group, which composes of Indigenous Chamorro and Carolinians among the locals, is followed with the second highest percentage relative to the overall count. According to the 2010 U.S. Census count for the CNMI, the Asians composed over 50 percent of the overall population

makeup of the CNMI and followed by the Pacific Islander group at a close 35 percent. This noticeably high percentage among the Asian ethnic group is largely attributed to the foreign workforce immigrants who come from various Asian countries to attain employment in the CNMI.

Furthermore, it is clear from the tables that the highest count among housing needs for the four income categories (AMI) are the households that have one problem as opposed to those that have none or no problem. This is also the case across the entire ethnic group as indicated on all the four tables.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction**0%-30% of Area Median Income**

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3094	2,136	0
White	124	85	0
Black / African American	7	5	0
Asian	1733	1,196	0
American Indian, Alaska Native	205	142	0
Pacific Islander	1021	705	0
Hispanic	4	3	0

Table 16 – Severe Housing Problems 0 - 30% AMI

Data U.S. Census Bureau, 2010 Census for the CNMI

Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3325	1,922	0
White	133	77	0
Black / African American	7	4	0
Asian	1862	1,076	0
American Indian, Alaska Native	221	128	0
Pacific Islander	1097	634	0
Hispanic	5	3	0

Table 17 – Severe Housing Problems 30 - 50% AMI

Data U.S. Census Bureau, 2010 Census for the CNMI

Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2085	1,179	0
White	83	47	0
Black / African American	5	3	0
Asian	1168	660	0
American Indian, Alaska Native	138	78	0
Pacific Islander	688	389	0
Hispanic	3	2	0

Table 18 – Severe Housing Problems 50 - 80% AMI

Data U.S. Census Bureau, 2010 Census for the CNMI

Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room,
4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1411	818	0
White	56	33	0
Black / African American	3	2	0
Asian	790	458	0
American Indian, Alaska Native	94	54	0
Pacific Islander	466	270	0
Hispanic	2	1	0

Table 19 – Severe Housing Problems 80 - 100% AMI

Data U.S. Census Bureau, 2010 Census for the CNMI

Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room,
4. Cost Burden over 50%

Discussion

A review of the data for Tables 16 to 19 shows a parallel result as those shown on Tables 12 to 15. In other words, severe housing problems among the ethnic groups in the CNMI is quite evident and still maintains the same for the Asian population as well as the local Pacific Islander group. Households that experience

severe housing problems, where there is one or more of the four housing problems is prevalent in the CNMI. Take for example, for those extremely low-income households who are within the 0-30 percent AMI category, where it is estimated at over 3,000 of the CNMI households having at least one or more housing problems; from an inefficient plumbing system, to a lack of a complete kitchen facility, to increases in housing cost burdens, or overcrowding issues. This is staggering numbers that can be interpreted as a definite “Housing Problem” in the CNMI.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:**Housing Cost Burden**

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	1560	994	355	0
White	62	40	14	0
Black / African American	3	2	1	0
Asian	874	557	199	0
American Indian, Alaska Native	104	66	24	0
Pacific Islander	515	328	117	0
Hispanic	2	1	0	0

Table 20 – Greater Need: Housing Cost Burdens AMI

Data U.S. Census Bureau, 2010 Census for the CNMI
Source:

Discussion:

Housing cost burden continues to be a problem among the extremely low to the low income households in the CNMI. Data derived from the 2010 U.S. Census show that approximately 1,500 households across racial and ethnic groups are experiencing high costs related to owning or renting a home as well as the increases in costs due to the associated expense that come with owning and/or living in a home. As indicated on Table 21, Asians, predominantly Migrant workers, and the Pacific Islander racial or ethnic groups, which include the Indigenous Chamorros and Carolinians are the most affected by housing costs.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Analysis of data gathered from the 2010 U.S. Census for the CNMI, as indicated in Tables 13 to 20, show that a high percentage of those extremely low and low-income families and households among homeowners and renters alike are experiencing the highest cost burden rate and coupled with one or more housing problems. A number of low-income renters earning less than 50 percent of area median family income experienced excessive housing cost burdens, paying more than 30 percent of gross income towards rent. In fact, this is realized when analyzing Table 9, where it is estimated that over 1,700 of large family renters experienced high cost burdens in the CNMI. Similarly, owner-occupied households within the same income category experienced the same, where approximately 300 large family households were accounted for in the same period. Moreover, the extremely low, low to moderate-income households reported substandard housing conditions to a greater degree than middle and upper income households.

As with the previous consolidated plan report and the 2010 statistical analysis, it can be concluded that the problem of overcrowding was not related to income or a “mismatch” of the housing stock and households. Instead, overcrowding affected all income groups equally and appeared to be related to the predominance of large families and households in the CNMI that can crowd even four-bedroom homes. From statistics gathered and analyzed from the 2010 U.S. Census (see Table 7), overcrowded to severely overcrowded homes, where there exists more than 1.51 people per room—totaled to 2,266 for the CNMI. While having one housing market, the CNMI has four distinct groups of housing consumer with different needs, resources and opportunities: 1) Migrant workers mostly from Asia, 2) U.S. Indigenous Chamorros and Carolinians, 3) U.S. Citizens not of CNMI descent, and 4) Immigrants from the Federated States of Micronesia.

Among the four groups, the Migrant workers occupy the highest percent of all housing units, and comprise the highest share and numbers of persons living below poverty.

Although discouraged by CNMI property alien laws from homeownership, U.S. citizens not of CNMI descent, representing less than 8 percent of all households, generally have sufficient incomes to locate adequate and affordable housing in the rental market. Few of these households are estimated to be living below the poverty level and in need of rental housing assistance on an annual basis. In contrast, most immigrant Micronesian households are not in position to afford adequate rental housing. While only comprising about 7 percent of all CNMI households, an estimated 45 to 50 percent of all Micronesian households are living below poverty, and are in need of rental assistance on an annual basis. In fact, the majority of the NMHC Section 8 clients are Micronesian households.

Chamorros and Carolinians, as CNMI descendants, are eligible under CNMI law to own land fee simple, and are further encouraged into homeownership through the Homestead program. Almost half of these estimated 4,500 to 5,000 households are very low, low-income households. Approximately 27 to 30 percent of all CNMI descendant households are living below poverty. Chamorro and Carolinian renter households living below poverty will continue to need rental assistance on annual basis.

It is estimated that 1,500 to 2,000 Chamorro and Carolinian renter households are eligible for homeownership. This is a conservative estimate, given the number of homestead applicants now estimated at over 4,000. Meanwhile, homeownership rates among Chamorros and Carolinians has increased faster than the number of all households formed. If this trend continues, the homeownership rate for indigenous ethnic groups will increase from about 60 percent to about 80 percent in the next five years. Most, if not all, of these new homeowners and about 1,300 or about 50 percent of existing Chamorro and Carolinian owner-occupants will need housing loan assistance either for new housing construction or housing rehabilitation. On annual basis, it is estimated that about 50 percent of lower income owner-occupants and new homeowners will need mortgage lending assistance.

Most of these households will reside in CNMI Homestead Villages. Because of the high concentration of indigenous households, homeownership and rapid growth without the development of adequate infrastructure, Homestead Villages also have extensive non-housing community development needs, such as recreational centers or

neighborhood parks. If pursued, village revitalization planning should incorporate housing surveys that result in housing and community development investment strategies tailored to each village housing market. To help achieve this goal would require increases in CDBG and HOME Loan Program funding as well as the Neighborhood Stabilization Program (NSP) as a way to enhance and improve the CNMI's residential communities; which in turn will lead to increases in equity and value to the overall Housing Market.

If they have needs not identified above, what are those needs?

Needs were identified above.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Racial segregation in the CNMI housing market is not evident, as rental housing is accessible to all ethnic groups. No village in the CNMI had a high concentration of any one ethnic group to exclusion of another. The variation that did exist on Saipan, Tinian, and Rota is a result of the homeownership opportunities provided to CNMI descendants in Homestead villages and the concentration of migrant worker housing on or near their place of employment such as those in the hospitality industry.

NA-35 Public Housing – 91.205(b)

Introduction

The Northern Marianas Housing Corporation (NMHC) is the Public Housing Agency (PHA) in the CNMI. Under the Section 8 Housing Assistance Payment Program – New Construction – NMHC owns and operates a total of 118 units throughout four (4) housing developments/project sites in the CNMI. In addition, NMHC may administer up to a total of 363 vouchers, of which 88% are currently being utilized. (as of February 2020, date of data collection)

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	0	320	0	320	0	0	0
<i>Data Source: PIC (PIH Information Center)</i>									

Table 21 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	
Average Annual Income	0	0	0	9,468	0	9,468	0	0	
Average length of stay	0	0	0	8	0	8	0	0	

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Household size	0	0	0	4.8	0	4.8	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	0	18	0	18	0	0
# of Disabled Families	0	0	0	25	0	25	0	0
# of Families requesting accessibility features	0	0	0	25	0	25	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0
<i>Data Source: PIC (PIH Information Center)</i>								

Table 22 – Characteristics of Public Housing Residents by Program Type

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	0	2	0	2	0	0	0
Black/African American	0	0	0	0	0	0	0	0	0
Asian	0	0	0	24	0	24	0	0	0
American Indian/Alaska Native	0	0	0	0	0	0	0	0	0
Pacific Islander	0	0	0	230	0	230	0	0	0
Other	0	0	0	66	0	38	0	0	0
<i>Data Source: PIC (PIH Information Center)</i>									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 23 – Race of Public Housing Residents by Program Type

Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	0	0	0	0	0	0	0

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Not Hispanic	0	0	0	320	0	320	0	0	0
Data Source: PIC (PIH Information Center) Resident Characteristics Report as of March 31, 2015.	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Ethnicity of Public Housing Residents by Program Type

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

As a recipient of HUD funding, NMHC is in compliance with Section 504, the Fair Housing Act, and the American with Disabilities Act. NMHC ensures that individuals with disabilities are afforded reasonable accommodations and requires compliance with these regulations for all New Construction Projects so as to continue assisting individuals and families.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

Based on the information above and NMHC's 5 Year and Annual PHA Plan, the most immediate needs focus on the following:

HCVP (waiting list of 202 families):

- Extremely-Low Income – Comprises 93% of families on the waiting list.
- Families with Children – Comprises 57% of families on the waiting list.
- Elderly Families – Comprises 5% of families on the waiting list.
- 2 Bedroom Units – Comprises 41% of requested unit size.
- 3 Bedroom Units – Comprises 17% of requested unit size.
- HCVP Participant Average Income – \$9,382

Multi-Family (waiting list of 564 families):

- Extremely-Low Income – Comprises 58% of families on the waiting list.
- Families with Children – Comprises over 50% of families on the waiting list. (NMHC was unable to extract the exact data due to system errors)
- Elderly Families – Comprises 15% of families on the waiting list.
- 2 Bedroom Units – Comprises 77% of requested unit size.
- 3 Bedroom Units – Comprises 11% of requested unit size.
- Multi-Family Program's Participant Average Income – \$6,853

Note: Data was extracted from WinTen2 System

The majority of households have income that fall well below HUD's extremely-low income level at 30% AMI; participants require the subsidized assistance for an average of eight (8) years. An improvement of household income is an immediate need as it will prove more difficult to attain permanent housing that is not federally subsidized without an increase in household income. The need still remains to increase the amount of assisted housing units, whether it is an increase in funding, voucher count, and/or availability of Low-Income Housing Tax Credits (LIHTC). In addition, the need to address the length of the waiting list is also a factor since it has been closed due to it exceeding the threshold; this threshold was increased recently from 150 applicants to 500 applicants before mandatory closing of the waiting list due to the high level of demand (HCVP). The Multi-Family Program continues to accept applications.

How do these needs compare to the housing needs of the population at large

These needs generally reflect the needs of the larger population. Needs that account for relatively large portions of the waiting lists, relative to the overall percentage of the population with those needs, include families with children, elderly families, and families needing 2 or 3 bedroom units. The median earnings in 2010 for the civilian employed

population 16 years and older is \$19,958, which is not too far in comparison to the average income of an HCVF participant.

Discussion

NMHC continues to be in compliance with Section 504, the Fair Housing Act, and the American with Disabilities Act. Based on the needs of the community and funding availability, NMHC will assess its need for additional accessible units. NMHC is soon to implement the HUD Family Self-Sufficiency (FSS) Program which assists participants achieve goals that promote self-sufficiency, improved economic status, and reduction of dependency on subsidized rental assistance. Opportunities provided through the FSS Program include education, job training and/or placement, counseling, and other social services.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The data provided below is a count of the sheltered and unsheltered population collected during the Point in Time Count (the most recent count was held in January 2020) in addition to the Section 8 program data. The CNMI, however, does not currently have a homeless shelter, supportive housing, or transitional housing services for the homeless and special needs population in need of housing assistance. In the next program year, the CNMI would like to revisit plans to start on a Transitional Housing Project funded through CDBG and upon implementation of a CoC in the CNMI (once approved by HUD), the CNMI plans to construct a homeless shelter and supportive housing.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
Ethnicity:	Sheltered:	Unsheltered (optional)

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

NMHC does not track the veteran status in the housing assistance programs, particularly the Section 8 Housing Choice Voucher and the Multifamily Program, as there are no veteran preference; however, through the HESG Program, since Fiscal years 2016 to 2020 (October 1, 2016- September 30, 2020), of the total 41 families who have requested for assistance, were eligible and availed of the program, NMHC assisted 1 family of with a veteran household member. (Data was extracted from HMIS). There are currently no veterans or and a total of 2 families on the HESG waiting list of approximately 5 families. Veteran status was not collected in the PIT count. In the most recent PIT count, conducted on January 2020, there were 174 households in the unsheltered population counted *with at least one adult and one child in the household* (comprised of 884 persons) were in need of housing assistance. There were 2 households, comprised of one person each, that were in need of housing assistance. In addition, there were a total of 156 households *with only adults* (comprised of 321 persons) in need of housing assistance. In the Section 8 HCVP Program, as of March 2021 PIC report, of the 202 families on the waiting list, approximately 16% are families with children (ages 0-6 years old). As with the Multi-Family Program, of the 562 families on the waiting list, there are a total of 322 children (0-6 years old); however, NMHC was unable to extract the number of households that correlates to this data. (Data extracted from WinTen2 System)

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Of the 1,207 persons counted in the 2020 PIT count, the sheltered population of 2 persons, 1 person was Asian and 1 person was of multiple races. Of the unsheltered population comprised of 1,205 persons, 36% were Asian, 63% were Native Hawaiian/Pacific Islander, and 1% of the total population counted was White. Note: The persons surveyed were either literally homeless or lived in substandard housing.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Comparison between 2019 and 2020 PIT Count conducted on the islands of Saipan, Tinian, and Rota:

2019 Unsheltered Population: 500 households, 1,787 persons

2019 Sheltered Population: 19 households, 20 persons

2020 Unsheltered Population: 330 households, 1,205 persons

2020 Sheltered Population: 2 households, 2 persons

The number of homeless households decreased by approximately 36%, and the number of persons decreased by nearly 33%. The decrease is due to the various federal programs, particularly FEMA, which provided rental assistance and other financial assistance to families who endured the catastrophic damages that Super Typhoon Yutu caused to the CNMI. Close to 5,000 homes were impacted, leaving families to live in FEMA-provided tents or continue to reside in their damaged residence which was not suitable for habitation. Starting FY 2019 to date, impacted families either availed of FEMA or SBA assistance or self-financed the rehabilitation/reconstruction of their homes. The Pacific Islander population, mostly comprised of citizens of the Federated States of Micronesia and indigenous Chamorro/Carolinian ethnicity, make up a majority of the homeless or at-risk population. Although some families still live in the tents, there has been a significant increase in rental assistance programs through US Treasury, HUD, and non-profit organizations that serve as options for the families to avail of.

Disaster Recovery Data Extracted from the CNMI's CDBG-DR Action Plan: Pre-storm, there were approximately 300 homeless households in the Commonwealth. Following the storms, this number surged to over 500 homeless households, mainly due to the loss and damage to the housing stock. The Commonwealth of the Northern Mariana Islands Homeless Coalition was established in 2017, which included the creation of the CNMI Homelessness Coalition Board. Initially, the board was comprised of representatives from the Division of Youth Services, Karidat Social Services, Salvation Army, Division of Youth Affairs, and the Northern Marianas Coalition Against Domestic and Sexual Violence. A Point-In-Time (PIT) homeless count was conducted in 2017, 2018, 2019, and 2020. In 2017, the count resulted in approximately 100 homeless individuals. In 2018 this number was 687. The most recent official PIT count in 2019 resulted in a significant increase in the number of persons that are homeless. There were 1,384 persons (2 emergency sheltered and 1,382 unsheltered).

To support and address homelessness, NMHC administers the Emergency Solutions Grant (ESG) Program and provides homeless individuals and families with rental and utility assistance for a period of 12 months. There is one Homeless Coalition located in the Commonwealth known as the CNMI Homeless Prevention Coalition. The coalition has been operating for almost a year now and assists with homelessness initiatives.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

In this section, the CNMI discusses the housing needs of special needs populations. HUD identifies special needs populations to comprise of elderly persons age 62 years and older, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction, public housing residents, and victims of domestic violence, dating violence, sexual assault, and stalking.

Describe the characteristics of special needs populations in your community:

Elderly (62 years and older)

HUD defines an elderly to be an individual who is 62 years and older; however, the CNMI Census 2010 data tallies the population for 60 years and older. Based on the 2010 Census data for the CNMI, of the total population 60 years and older, 16% are below the poverty level, and 19% of the population have a disability.

There was also a 59% increase in householders whose age ranged from 65-74 years old in renter-occupied units, while there was a 29% increase in householders within the same range in owner-occupied units. As with the elderly population, for those ages 75-84, there was a 50% increase in householders since 2000 and a 31% increase for those 85 and over in owner-occupied units. For the renter-occupied units, there was an increase 36% increase in householders ages 75-84, and a 50% increase in householders ages 84 and over.

Persons with Alcohol or Other Drug Addiction

The most recent data for FY 2019 gathered from the Community Guidance Center of the Department of Public Health that during the year, a total of 109 individuals were identified to have alcohol or other drug addiction. Data is categorized into the particular disorder, gender, and age group:

Table 1. Clients/Consumers with Substance Use Disorders by Gender for 2019

	Female	Male	Grand Total
Alcohol Use Disorders	4	35	39
Alcohol-Induced Disorders		2	2
Amphetamine Use Disorders	5	36	41
Cannabis Use Disorders	4	17	21
Cannabis-Induced Disorders		1	1
Hallucinogen Use Disorders		1	1
Nicotine Use Disorder	1	2	3
Polysubstance-Related Disorder		1	1
Grand Total	14	95	109

Source: CGC Database

Table 2. Clients/Consumers with Substance Use Disorders by Age Group for 2019

	18-24 Year	25-44 Year	45-64 Year	Grand Total
Alcohol Use Disorders	4	26	9	39

Alcohol-Induced Disorders		2		2
Amphetamine Use Disorders	2	31	8	41
Cannabis Use Disorders	4	15	2	21
Cannabis-Induced Disorders	1			1
Hallucinogen Use Disorders		1		1
Nicotine Use Disorder		2	1	3
Polysubstance-Related Disorder		1		1
Grand Total	11	78	20	109

Source: CGC Database

This is the most accurate count of persons with alcohol or drug addiction who were reported to the Community Guidance Center. conducted a PIT survey to gather this type information which would reflect the island-wide count.

Persons with Disabilities

Of the total civilian non-institutionalized population, 5% of adults 18 years and older have a disability and 1% of children under the age of 18 are disabled. Of the total civilian non- institutionalized population who are 65 years and older, 1% have a disability. According to the U.S. Census Bureau, 2010 CNMI Census, only 42% of disabled adults are employed while 83% of non- disabled adults are working.

According to HUD, a chronically homeless individual or in the case of a family household, an adult head of household (or if there is no adult in the family, a minor head of household) who (i) is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and (ii) has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years; and (iii) can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Right Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability. The PIT count conducted in 2019 identified (25) households who were chronically homeless.

Persons with Disabilities Segregated by Category (2019 data provided by the Northern Marianas Protection and Advocacy Systems (NMPASI):

1) Protection and Advocacy of Individual Rights	35 clients
2) Traumatic Brain Injury Program	1 client
3) Protection and Advocacy for Individuals with Mental Illness	9 clients
4) Advocacy for Developmental Disabilities	28 clients
5) Client Assistance Program	4 clients
6) Protection and Advocacy for Beneficiaries of Social Security	1 client
7) Protection and Advocacy for Assistive Technology	2 clients

Persons with HIV/AIDS and Their Families

Cumulatively, there have been 33 persons diagnosed with HIV in the CNMI since 1997. (Data collected from the Communicable Disease Division of the Department of Public Health).

Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking

The most recent data for FY 2019 was gathered from the Guma Esperansa Domestic Violence Shelter which provides shelter for victims of domestic violence and sexual assault. In Calendar Year 2019, 68 individuals were victims of domestic violence, 2 individuals were victims of sexual assault, 1 victim of human trafficking. In total, there were 80 secondary victims. There were a total of 2,683 bednights in Calendar Year 2019. As for the transitional housing

program, Get Hope, specifically for victims of domestic violence, sexual assault, and dating violence, since the program's inception in 2017, the Guma Esperansa Shelter served approximately 38 families who spent close to 30,000 bed nights altogether. The Get Hope program provides housing assistance specifically for victims for a period of up to (2) years. As a result of the Get Hope Program, the number of shelterees decreased by 51% from 2018.

What are the housing and supportive service needs of these populations and how are these needs determined?

Elderly (62 years and older)

In 2010, the total population of the CNMI declined by 30%. The total number of senior citizens from age 60 and up increased by 18% which also comprises 6.7% of the total population in 2010. NMHC, the only designated Housing Authority in the CNMI, provides housing needs to elderly clients. In the Section 8 and HCVP Program, being Elderly is one of the preferences for those applying for housing assistance. The Mortgage and Credit Division continues to offer assistance for the rehabilitation, new construction or acquisition of a home for elderly clients who meet the eligibility criteria. The Office of the Aging, under the Department of Community and Cultural Affairs, is a government operated entity which provides supportive services to the elderly. Several programs provided are the following: Computer Literacy Class, Music Class, Health Walk, Water Therapy, Cultural Tutorial, and a variety of recreational activities. The Office of the Aging also provide the clients they serve with the resources they need to maintain physical, mental, psychological, social, and emotional well-being. The needs of the elderly are determined through referrals from entities such as the Office of the Aging and by family and friends.

Persons with Disabilities

MultiFamily Units

NMHC is allowed up to (132) vouchers for the MultiFamily Program. There are currently 116 occupied units in the MultiFamily Program- 80 units on Saipan, 20 units on Tinian, and 16 units on Rota. Of the 116 total units, there are 9 ADA units- 7 units on Saipan, 2 units on Rota, and 1 unit on Tinian. In addition, one of the preferences are for the households with member with a disability. The Northern Marianas Protection and Advocacy Systems, Mental Health Planning Council, Office of Vocational Rehabilitation, and Council on Developmental Disabilities provide a variety of supportive services for persons with disabilities. Although there are sufficient supportive service needs for people with disabilities, about 1% of the households on the waiting list have a disabled family member in the household are in need of housing assistance.

Homeless Programs

The CNMI does not operate supportive housing beds for homeless individuals and families with disabilities. However, through the HESG Program, NMHC provides rapid re-housing and homelessness prevention assistance is given to homeless and at-risk families, some of which have a disability. Of the average number of families (6 families per year), at least 1 of the families have a disability.

Persons with Alcohol or Other Drug Addiction

The CNMI does not operate homeless programs specifically targeting persons with alcohol or other drug addiction. However, in the next five years, the CNMI hopes to complete a transitional housing program to address the needs of this specific population. These particular persons receive treatment and supportive services through the Community Guidance Center of the Department of Public health. Supportive services include:

- Substance abuse individual counseling
- Substance abuse group counseling
- Individual and group counseling addressing gambling addiction
- Family education/counseling regarding substance abuse
- Work with Behavioral Health Services to address Co-occurring Disorders
- Drug-Free Workplace Program Supervisory Training
- Drug-Free Workplace Program Employee Education

Persons with HIV/AIDS and Their Families

The CNMI does not receive HOPWA (Housing Opportunity for Persons with AIDS) funds through HUD. However, it does receive federal funds for the Ryan White HIV/AIDS Program (RWHAP) which is managed through the Department of Health. This program provides medical case management, primary care, and other supportive services for low-income and underinsured individuals with HIV/Aids. In the CNMI, the latest report (as of 2017) reflects a total of 33 persons were diagnosed with the virus since 1997.

Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking

Statistics of the victims were mentioned in the beginning of the Consolidated Plan. The Guma Esperansa Shelter provides shelter, food, and supportive services for victims, and the CNMI Coalition Against Domestic Violence is a non-profit entity which works to fulfill this mission by addressing the issues of domestic violence and sexual assault through community outreach efforts, providing training to service providers and responders, nurturing meaningful partnerships with groups or individuals, as well as working to create social change. Less than 10% of the waiting list in the housing programs are victims of domestic violence, sexual assault, and/or human trafficking.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

The CNMI is not seeking funding under the HOPWA program as it does not have an eligible metropolitan statistical area.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

- To acquire, construct, or rehabilitate facilities for low-moderate income communities and special needs populations
 - Sports and Recreational Facilities
 - Community Centers
 - Facilities that improve services to the general public
 - Youth Centers
 - Community Centers

How were these needs determined?

The CNMI addresses the needs of these low/moderate income areas by acquiring, constructing, or rehabilitating facilities that will benefit the low-mod income population. As stated earlier, of the CNMI's total population, 84.5% are low-mod income.

Over the last five years, the CNMI has funded several public facilities and improvement projects that served particularly the youth of the CNMI through the rehabilitation of parks, rehabilitation of community center and youth center facilities, and have also funded the Department of Fire through the purchase of a fire truck and high pressured pumps for a fire station (located in heavily populated low-income neighborhoods). In total, the CNMI invested over \$2M in CDBG funds to meet the needs of low-and moderate-income neighborhoods.

This PY2020 Action Plan cycle identified two projects (categorized under Public Facilities) to fund: Tinian Children's Park Improvement and the Purchase of Personal Protective Equipment and (2) Wildland Trucks for the Department of Fire and Emergency Medical Services. The total allocation to these projects is \$732, 977 (which is 80% of the entire CDBG allocation, 20% is set-aside for planning and administrative costs.

Describe the jurisdiction's need for Public Improvements:

It's the CNMI's goal to support public improvement projects with CDBG funding, specifically to develop or improve infrastructure such as road repairs, rehabilitation of water reservoirs, rehabilitation or installation of street lighting, and the rehabilitation or construction of water and erosion management projects (ponding basins, water catchments, drainage systems etc.) This need has been more prevalent since Super Typhoon Yutu made landfall in October 2018. In 2018, NMHC reallocated CDBG funds from various projects to fund a debris removal project on the islands of Saipan, Tinian, and Rota, in the amount of \$300,000. NMHC was also allocated CDBG-DR funding in the amount of \$244M, and about \$100M will be allocated to public infrastructure improvements that tie to housing.

How were these needs determined?

The CNMI has identified to support the infrastructure improvements such as street lighting, rehabilitation water reservoirs, repair of roads, rehabilitation or construction of water and erosion management projects. Several problems mainly with water and erosion management include the overflow of water (during typhoon season) in villages such as Garapan and Chalan Kanoa/Susupe and sewage spills in the village of Koblerville and San Antonio. The needs were determined by several consultations with the CIP Office and the Department of Public Works, along with Legislators who have consulted with NMHC on funding that will particularly aid in infrastructure improvements in their respective precincts. These problems directly affect the village residents and pose as a health and safety hazard. CIP funding is insufficient to address significant infrastructure issues that the CNMI is facing today. In terms of Super Typhoon Yutu and the severe damages it caused to housing, public infrastructure such roads, water tank

systems, schools, etc., the needs were determined by consultation with the various government agencies, the CNMI Public Assistance Office, CNMI Hazard Mitigation Office, and FEMA.

Describe the jurisdiction's need for Public Services:

Although it was a low priority for CDBG funding from 2015-2019, there is a wide-ranging need for services to promote and protect the health, safety, moral, and welfare of the residents living in the villages of Saipan. The services include after-school and summer programs for the youth, programs for the elderly who have no means of transportation to the island's only aging center in central Garapan, sanitation to protect public health, workforce development training to address the low-income population, other homeless programs for the special needs population, transitional housing programs, supportive housing programs, programs particularly for veterans, and programs that promote healthy living through encouragement to grow fresh produce in community gardens. In the past

How were these needs determined?

The needs for public services is evident in the CNMI as there are no supportive housing programs, no transitional housing programs, and very limited programs particularly for the youth and veterans. The only housing assistance program in the CNMI is the Section 8 and Multi-Family Programs administered by NMHC, the ESG Program administered by NMHC (homeless and at-risk households), monthly motel vouchers distributed by Karidat Social Services for homeless households funded by the United Way.

Disaster Recovery Data extracted from the CNMI's CDBG-DR Action Plan: The islands' main power lines were ripped apart from the over 200 mph winds, shutting down power to homes for weeks. Roadways were littered with downed power lines, tree branches, and debris. Cars were destroyed by debris and severe wind damage occurred that resulted in overturned vehicles. Multiple educational institutions as well as the local college were completely destroyed and rendered inoperable. The Saipan International Airport sustained significant damage, terminals flooded, and navigation aids were rendered inoperable. The authorities of Saipan, Tinian, and Rota applied for FEMA Public Assistance (PA) following the typhoons for repairs needed to various government-owned facilities. There was a total of \$170,693,936.95 obligated in Public Assistance Grants to the islands of Saipan, Tinian, and Rota. More funding is needed to address infrastructure and mitigation needs; therefore, priority projects had to be selected. The FEMA Public Assistance is the best available data set to determine infrastructure needs after Typhoon Mangkhut and Super Typhoon Yutu.

CNMI Infrastructure

Significant damage occurred to all areas and the following offices, authorities, and other entities submitted projects totaling over \$680 million in needed funds.

- ▶ Micronesian Legal Services Corp
- ▶ CNMI Judiciary
- ▶ Northern Marianas Trades Institute
- ▶ CNMI Office of Homeland Security
- ▶ Marianas Visitors Authority
- ▶ Office of the Mayor Saipan
- ▶ Office of the Mayor Rota
- ▶ Department of Fire and EMS

- ▶ Commonwealth Ports Authority
- ▶ Northern Marianas College
- ▶ Office of the Mayor Tinian
- ▶ CNMI Public School System
- ▶ Commonwealth Health Care Corp
- ▶ Department of Public Works
- ▶ Commonwealth Utilities Corp

The following chart demonstrates the approximate PA Costs by PA Category. The Local Match is 10 percent of the approximate public assistance cost and resiliency is 15 percent of the 10% local match cost (not including Debris Removal and Emergency Protective Measures). The CNMI's FEMA cost share is estimated at around \$23M.

Housing Market Analysis

MA-05 Overview

Households Experiencing Severe Housing Problems

In the CNMI, extremely low income and very low-income households are experiencing the most severe housing problems. However, some problems such as overcrowding are more closely related to large households than it was to lower incomes. Furthermore, lower income homeowners are more likely than lower income renter households to experience overcrowding and inadequate housing conditions, while renters are more likely to experience affordability problems.

Alien Migrant Workers have increased their entrance into the private housing market in greater numbers within the last seven years, due to the collapse of the CNMI garment industry and; along with it, the downsizing of “barracks” and other employer-provided housing. As a result, the Migrant Workers now comprise the largest share of households and have a substantial impact on the availability, adequacy and affordability of rental housing. However, alien households are especially transient and they are not eligible for direct rental assistance and homeownership programs such as those provided by NMHC through the Section 8 and the HOME Loan Programs. Therefore, the focus of housing problems and solutions must be directed at indigenous households, CNMI born Chamorros and Carolinians. As such, it can be foreseen, that by aiding this major segment of the population to reach decent and affordable homeownership, the decent and affordable rental housing will filter-down to the Migrant households.

Most elderly, homeless and persons with special needs are living with indigenous family households, and therefore are counted among family households needing housing assistance due to low incomes and physically inadequate housing conditions. These indigenous households with elderly, at-risk families and persons with disabilities will require supportive services to help them maintain their independence and access to housing.

Extremely Low to Low-Income Households:

Approximately 55 percent of extremely low-income and 35 percent of low-income owner-households with mortgages reported excessive monthly housing cost burden. Other owners with a mortgage did not experience excessive cost burdens to a significant degree. It is estimated that 200 low-income owner-occupant households are currently experiencing excessive monthly housing cost burdens, due to mortgage payments and high utility costs.

About 25 percent of extremely low-income and 20 percent of low-income renter households paid more than 30 percent of their incomes toward gross rent. However, about half of these lower income non-owner household benefited from occupying units without payment of cash rent. Overall, income groups (all categories) have benefited from occupancy without payment of cash rent, it has benefited the extremely low and low-income households the most.

Overcrowding and Income:

Most owner-occupant households in the CNMI, regardless of income, suffered from overcrowded to severely overcrowded housing conditions, with an average household size of 4.15 persons. Upper income owner-occupants are almost as likely to experience overcrowding as extremely low-income owner-occupants.

While also experiencing overcrowded housing conditions, renter households experienced less overcrowding than owner-occupants did. About 40 percent of renter households experienced overcrowding and 20 percent experienced severe overcrowding. As with owner-occupants, the cause was not dependent on income as much as the number of large households. The extremely low and low-income

renters experience higher rates of overcrowding; over 40 percent compared to about 35 percent for moderate and middle income renters, but the difference was not significant.

Groups of Housing Consumers within the Housing Market:

The CNMI, while having one housing market, has four distinct groups of housing consumers with different needs, resources and opportunities. Migrant workers mostly from Asia are the largest group, representing about 70 percent of all renter occupied households and 15 percent of owner occupied households. The next largest segment of housing consumers is the indigenous Chamorros and Carolinians of CNMI descent. They currently represent about 45 percent of the overall housing market and have the most access to homeownership.

Chamorro and Carolinians, as CNMI descendants, are eligible under CNMI law to own land fee simple, and are further encouraged into homeownership through the CNMI Village Homestead Program. While CNMI indigenous housing consumers have experienced growth in household income, almost half of these households are low-income to extremely low-income. The overall CNMI Median Family Income in 2010 according to the U.S. Census was \$22,455. And, 33 percent, or approximately 3,600 are families with income below \$15,000. Most households were clustered around the extremely low to low-income categories, then tapering off in the moderate and middle income groups, before the number of households increased among the upper income group. Because of their very low incomes, about half of the Chamorro and Carolinian renter households will continue to need rental assistance on annual basis.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)**Introduction****All residential properties by number of units**

Property Type	Number	%
1-unit detached structure	8,925	43%
1-unit, attached structure	3,185	15%
2-4 units	1,920	9%
5-19 units	4,844	23%
20 or more units	1,830	9%
Mobile Home, boat, RV, van, etc	146	1%
Total	20,850	100%

Table 25 – Residential Properties by Unit Number**Data** US Census 2010, CNMI**Source:****Unit Size by Tenure**

	Owners		Renters	
	Number	%	Number	%
No bedroom	63	5%	1,306	95%
1 bedroom	476	11%	3,966	89%
2 bedrooms	1,411	27%	3,726	73%
3 or more bedrooms	2,587	51%	2,500	49%

Table 26 – Unit Size by Tenure**Data** US Census 2010, CNMI**Source:****Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.**

There are approximately 478 units that are currently in use are assisted with federal, state, and local programs. These units consist of CNMI's Housing Choice Voucher Program, Multi-Family Program, and ESG. These programs assist individuals and families with extremely-low to low-incomes (< 50% LMI) with the ESG program targeting folks who are homeless. Total "units in-use" breakdown as follows(households) : Mihaville: 48, Koblerville: 32, Tinian Broadway Estates: 20, Blue Bay Homes: 16, Regular ESG Program: 14 (as of PY 2019)

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

The Northern Marianas Housing Corporation (NMHC) is the Public Housing Agency (PHA) in the CNMI. Under the Section 8 Housing Assistance Payment Program – New Construction – NMHC owns and operated a total of 132 units throughout the following four (4) housing project sites in the CNMI: Mihaville Estates (Saipan) - 48 Units; Koblerville Estates (Saipan) - 34 Units; Tinian Broadway Estates – 20 Units; and Rota Blue Bay Homes – 16 Units Online and 14 Units Off-Line. Currently, there are only sixteen (16) online units at Rota Blue Bay Homes since fourteen (14) units had to be taken off-line due to deteriorating conditions of the units brought about by environmental factors based

on the projects site's close proximity to the ocean side on the island. NMHC is exploring options to address these units so that the agency may initiate action to bring the fourteen (14) off-line units back online to regain a total of 132 units. The 118 units remain on-line and are well-maintained. The CNMI does not expect to lose any housing inventory unless a catastrophic storm happens in the near future. Although the aftermath of Super Typhoon Yutu caused severe damages to the CNMI housing and infrastructure, NMHC was able to restore its assisted units shortly after the storm.

Does the availability of housing units meet the needs of the population?

There still exists a disparity gap between the needs of the population and the availability of housing units in the CNMI. Since homeownership is for the most part limited to CNMI indigenous households, it is estimated that about 1,500 Chamorro and Carolinian renter households are currently eligible for homeownership. Most, if not all of these new homeowners, along with about 1,300 or 50 percent of the existing Chamorro and Carolinian owner-occupants will eventually need housing loan assistance, either for new housing construction or housing rehabilitation. Individually owned single-family dwellings are still not fully upgraded to meet decent, safe and sanitary conditions for the extremely-low to moderate-income families. NMHC has used HOME funds to assist in home upgrades and have brought up many homes to safe, sanitary, and decent conditions.

Describe the need for specific types of housing:

Homeowners

There still exists a disparity gap between the needs of the population and the availability of housing units in the CNMI. Since homeownership is for the most part limited to CNMI indigenous households, it is estimated that about 1,500 Chamorro and Carolinian renter households are currently eligible for homeownership. Most, if not all of these new homeowners, along with about 1,300 or 50 percent of the existing Chamorro and Carolinian owner-occupants will eventually need housing loan assistance, either for new housing construction or housing rehabilitation. Individually owned single-family dwellings are still not fully upgraded to meet decent, safe and sanitary conditions for the extremely-low to moderate-income families. NMHC has used HOME funds to assist in home upgrades and have brought up many homes to safe, sanitary, and decent conditions.

Elderly, Homeless and Persons with Special Needs

Assisting the elderly, homeless and persons with special needs is the social cohesion of the Chamorro and Carolinian communities and families, and the support of the Office of Aging, Division of Youth Services, Developmental Disabilities Council, and private agencies. It is true that many persons who are evicted from housing or have separated from dysfunctional families find temporary shelter with other family members. Still, temporary shelter and emergency housing assistance will be required to supplement private and community support.

Rental Housing Assistance

There are an estimated 1,250 very low-income households (earning 50 percent of area median income) eligible for rental assistance in the CNMI. NMHC has a waiting list of 700+ families in need of housing through the Section 8 Voucher Program. At present, NMHC has 363 approved Voucher Choice units and 132 Project-Based New Construction units. These units are occupied 100% of the time throughout the program year. Applicants for housing currently wait 2-3 years before a unit can be identified for occupancy. This clearly demonstrates the continuing need for housing throughout the CNMI.

In cooperation with the public housing agency or agencies located within its boundaries, describe the needs of public housing, including the number of public housing units in the jurisdiction, the physical condition of such units, the restoration and revitalization needs of public housing projects within the jurisdiction, and other factors, including the number of families on public housing and tenant-based waiting lists and results from the Section 504 needs assessment of public housing projects located within its boundaries (i.e. assessment of needs of tenants and applicants on waiting list for accessible units as required by 24 CFR 8.25). The public housing agency and jurisdiction can use the optional Priority Public Housing Needs Table of the Consolidated Plan to identify priority public housing needs to assist in this process.

NMHC has a waiting list of 600+ (as of March 2021) families in need of housing through the Section 8 Voucher Program. At present, NMHC has 363 approved Voucher Choice units and 132 Project-Based New Construction units. These units are occupied 100% of the time throughout the program year. According to the Household Income and Expenditure Survey conducted in 2016, there are close to 10,000 renter-occupied units in the CNMI. The NMHC seeks to improve the quality of life for the elderly and individuals with disabilities, utilizing CDBG funding, through rehabilitation of their housing units to achieve compliance with the Section 504 and the Americans with Disabilities Act. Applicants for housing currently wait 2-3 years before a unit can be identified for occupancy. This clearly demonstrates the continuing need for housing throughout the CNMI.

There is still a need for new home construction in the CNMI; the demand for housing is still evident but project activity has been stagnant due to the increasing costs for housing as well as coupled with the shortage in contractors. Indeed this has been an impediment in the CNMI in the past four years. First-time homeowners have sought HOME Program for assistance in the construction of a new home or for the acquisition and repair of a residential dwelling unit. From 2016 -2020, NMHC has approved a total of nineteen (19) applicants for the purchase and repair of a home. This assistance alone equates to more than half of the total HOME-approved applicants for the period. Furthermore, in the past five years, from 2016-2020, NMHC has tapped into the HOME Program to fund over 40 related housing projects in the CNMI. And, this count totals to nearly \$3.5 million in estimated funding for the period. As this translates to a steady rate of approximately eight (8) HOME project applications per year, it is clear that the CNMI is experiencing a decreased demand for housing as compared to prior years when the cost of housing was at a relatively affordable price, especially for the low-income first-time homeowners.

Accordingly, the Consolidated Plan seeks to address the critical unmet needs of the extremely-low to the moderate-income households through rehabilitation assistance and opportunities, such as the construction or purchase of a home, for those first-time homebuyers.

As a HUD recipient of federal funding, the NMHC fully complies with corresponding rules and regulations, such as the Fair Housing Act, Rehabilitation Act, the Americans with Disabilities Act, and the Architectural Barriers Act. The NMHC ensures that any individual with a physical or mental impairment that interferes with a major life activity is afforded reasonable accommodation. Furthermore, NMHC requires compliance with these regulations for all rehabilitation and new construction projects and plans to assist at least fifteen individuals or families over the next five years.

Disaster Recovery Data was extracted from the CNMI's CDBG-DR Action Plan: CNMI will provide three program options to assist eligible homeowners/leaseholders with their housing: new construction, rehabilitation, and reconstruction needs. This includes a Homeowner Rehabilitation and Reconstruction Program, a Single-Family New Construction Development Program, and for renters, an Affordable Rental Housing Development Program. Additionally, a down payment closing cost assistance program may be established to support the Single-Family New Construction Development Program. Eligible residents on each of the Islands are eligible to apply and participate in these programs with priority placed on elderly or disabled residents with incomes between 0%-30% of the area median income. Elderly or disabled household applicants may receive 100% forgivable loan assistance with an affordability period of 20 years on a 30-year term.

- (1) An elderly family is a family whose head of household, spouse, or sole member is age 62 or older.
- (2) A disabled family is a family whose head of household, spouse, or sole member is a person with a disability. Person with a disability:
 - (A) Means a person who:
 1. Has a disability, as defined in 42 U.S.C. § 423;
 2. Is determined, pursuant to HUD regulations, to have a physical, mental, or emotional impairment that:

- i. Is expected to be of long-continued and indefinite duration;
 - ii. Substantially impedes his or her ability to live independently, and
 - iii. Is of such a nature that the ability to live independently could be improved by more suitable housing conditions; or
 - iv. Has a developmental disability as defined in 42 U.S.C. § 6001.
- (B) Does not exclude persons who have the disease of acquired immunodeficiency syndrome or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome; and
 - (C) Does not include a person whose disability is based solely on any drug or alcohol dependence.
 - (D) The applicant's physician must complete the Homebuyer/Homeowner Program Disability Eligibility Verification Form to certify the borrower's disability. As appropriate, NMHC shall require a court legal guardianship in cases where the physician certification indicates that the applicant is incapacitated or incompetent to enter into a legal and binding agreement such as a mortgage.

Citizenship requirements must comply with Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, 41 USC 601 et seq. (PRWORA) which governs the eligibility of persons (U.S. citizens, U.S. nationals, and qualified aliens) for "federal public benefits" as defined in section 401(c) of that law. With the ever-increasing costs of materials and labor, home repairs and constructing or purchasing homes may appear to be out of reach for the CNMI's low-income families. The housing options provided to these families under the CDBG-DR Housing Programs along with HUD guidelines will make home repairs, new construction, purchase of homes, and rentals attainable and affordable. Further and aside from deferred loans, a combination of deferred loans and zero percent interest loans, low-income families will also be assisted through deep subsidies to ensure that they will be able to move into safe, decent, and sanitary homes with regards to program recipients, no applicant will receive more assistance than the cap listed for the program in the guidelines, and no applicant can receive assistance in excess of the total amount allocated for the total program. Circumstances, where additional costs may be incurred, will be reviewed against cost reasonableness guidelines and to meet reasonable accommodations and accessibility requirements. However, the sales price must not exceed HUD's existing or new homes HOME purchase price limits. NMHC anticipates assisting more than 800 families by the time the grant closes 6 years from the date of the grant agreement. From the FEMA data (January 2019), 545 units were destroyed and 2,291 units were seriously damaged, therefore the number of units estimated to be completed still leaves a gap of over 2000 units that will not be addressed.

Special requests through the appeal process can be made for justification that may exceed the program cap.

The Housing Recovery Plan includes priorities for the following activities:

- ▶ Homeowner Rehabilitation - Provide funding to homeowners/leaseholders to rehabilitate or rebuild disaster-damaged residences.
- ▶ Homebuyer - Provide funding to households to buy/lease new homes or build new homes, if waivers are granted, to replace disaster-damaged residences.
- ▶ Rental Rehab and Reconstruction - Provide financial assistance to existing or new landlords to rehabilitate affordable rental housing units.

Homeowner Rehabilitation and Reconstruction

The Homeowner Rehabilitation and Reconstruction Program is designed to cover the eligible costs to rehabilitate or reconstruct storm-related damaged properties in order to restore homeowner properties to decent, safe, and sanitary conditions. The Governor of the CNMI has placed housing as the highest recovery priority. HUD identified "most impacted and distressed" areas of Saipan and Tinian which are earmarked for, at a minimum, 80 percent of the CDBG-DR funding.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

This section addresses the cost of housing, housing affordability, and monthly rent according to HUD's current Fair Market Rent and HOME Rents. According to Table 28, most rental contracts rent are less than \$500 per month, followed by rental contracts with rent amounts between \$500-\$999 per month. The CNMI is unable to determine the percentage of units affordable to households' earnings.

Cost of Housing

Table 27 – Cost of Housing

Rent Paid	Number	%
Less than \$500	6,271	54.5%
\$500-999	2,037	17.8%
\$1,000-1,499	374	3.2%
\$1,500-1,999	123	1.1%
\$2,000 or more	2,693	23.4%

Table 28 - Rent Paid

Data US Census 2010, CNMI

Source:

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	No Data	No Data
50% HAMFI	No Data	No Data [review mortgage purchase price]
80% HAMFI	No Data	No Data [review mortgage purchase price]
100% HAMFI	No Data	No Data [review mortgage purchase price]

Table 29 – Housing Affordability

Data None available

Source:

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	786	844	1030	1501	1794
High HOME Rent	1179	1266	1545	2251.5	2691
Low HOME Rent	393	422	515	750.5	897

Table 30 – Monthly Rent

Data HUD FMR and HOME Rents

Source:

Is there sufficient housing for households at all income levels?

It can be argued that there is insufficient housing in the CNMI for households across all income levels. Based on the 2010 statistics, it becomes clear that more than half of both small and large family households that fall in the 0- 30% and 30-50% AMFI are in greater need of public housing assistance. An estimated count of 7,000 of the CNMI's small family households and 1,200 of large family households are considered at-risk as these households are the extremely low-income (0-30% AMFI) to the moderate-income families (>30% - 50% AMFI). Most of these extremely low-

income families are struggling to make ends meet and to keep up with their mortgage or rental payments, let alone, to pay for high utility costs. As a result of this, families will tend to resort to available public housing assistance such as the Section 8 Multifamily Program or the Housing Choice Voucher Program (HCVP) as administered by NMHC. And, given that the wait list continues to increase for these programs, are true indicators that the supply does not meet the current demand for public housing in the CNMI. Further funding, planning, and implementation of programs may be needed in order to reach an equilibrium level where the at-risk, extremely-low and low-income families and households, can be adequately assisted and thereby preventing and minimizing the impact of homelessness in the CNMI.

How is affordability of housing likely to change considering changes to home values and/or rents?

During the turn of the new millennium, the home values as well as rental rates have been relatively stagnant in the CNMI considering the state of the economy. With the fall of the garment industry and coupled with the population decline due largely to deportations and displacements of Migrant Workers within the labor force, has led to a sharp decline in the CNMI's overall economy.

Fortunately, there are positive signs that the CNMI economy is at an upswing and is safe to say that it is coming out of the economic "trough" which will have a positive influence in other industries or markets within the CNMI, such as the Housing Market. As such, home values and/or rents have shown slight increases within the past couple of years and are projected to continue in the next few years until the Housing Market corrects itself to the point of equilibrium where the demand for homes match the set forth price. Because of this, the affordability for new construction or home acquisition in the CNMI will likely change to a positive level where home prices start to increase, thereby having a higher rate of return on investment; and where increases in home equity will be more realized in the long-term.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

Discussion

The CNMI's Area Median Rent (AMR) as indicated by the 2010 U.S. Census is \$324 and is less than half of the Fair Market Rent (FMR) of \$786 as provided by HUD for the "Pacific Islands." It can be argued that the AMR is a better indicator of the rental rates for the CNMI as based on cost of living, family size, unit size, and household income for the area.

Because the AMR is a relatively low rate, there should not be a significant "negative" impact that this may have on NMHC's strategy to produce or preserve affordable housing. Take for instance, one of the agency's housing programs, is the administration of the HUD-funded HOME Loan Program for the rehabilitation, construction, or acquisition of units for the purpose of assisting the extremely low, very low, and low income households as based on HUD's Income Limit summary table. As such, the mortgage monthly payments for the HOME Program do not go beyond the indicated AMR, which justifies the program's intended purpose which is to provide extremely low to low-income families with a decent, safe, and affordable home.

For CDBG-DR Updates, please see Section MA10 related to this section

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

The CNMI finds that most owner-occupied and renter-occupied units were constructed between 1980-1999, 64% and 65% respectively. Eleven percent of owner-occupied and 6% of renter-occupied housing was constructed before 1979 which would indicate the possibility of lead-based paint hazard.

Definitions

The CNMI defines a “standard” housing to be a structure that meets the International Building Code. Given the weather conditions and natural disasters such as Typhoons and earthquakes, structures must withstand winds of at least 170mph and seismic zone 4. The CNMI Census 2010 identifies units that lack plumbing facilities, kitchen facilities, air-conditioning, etc.; however, the data does not reflect units with one selected condition and so forth. Data is currently unavailable for the CNMI.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition				
With two selected Conditions				
With three selected Conditions				
With four selected Conditions				
No selected Conditions				
Total				

Table 31 - Condition of Units

Data *No data source available for the above table*

Source:

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,099	24.22%	3,299	28.69%
1980-1999	2,943	64.87%	7,505	65.27%
1950-1979	483	10.65%	670	5.83%
Before 1950	12	0.26%	24	0.21%
Total	4,537	100%	11,498	100%

Table 32 – Year Unit Built

Data *U.S. Census Bureau, 2010 Census Commonwealth of the Northern Mariana Islands.*

Source:

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980.	495	42%	694	58%
Housing units built before 1980 with children present	No Data	No Data	No Data	No Data

Table 33 – Risk of Lead-Based Paint

Data U.S. Census Bureau, 2010 Census Commonwealth of the Northern Mariana Islands.

Source:

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	No Data	No Data	4,805
Abandoned Vacant Units	No Data	No Data	1,615
REO Properties	No Data	No Data	No Data
Abandoned REO Properties	No Data	No Data	No Data

Table 34 - Vacant Units

Data U.S. Census Bureau, 2010 Census Commonwealth of the Northern Mariana Islands.

Source:

Need for Owner and Rental Rehabilitation

The CNMI cannot determine this figure, as it only has access to the Census 2010 information which provides the number of vacant units and abandoned vacant units. The CNMI cannot determine if the units are suitable or not suitable for rehabilitation. A determination of homes that are suitable for rehabilitation are determined on a case by case basis such as when a homeowner submits an application for homeowner rehabilitation through CNMI/NMHC's Homeowner Rehabilitation Loan Program. The CNMI estimates about 1,189 families living in homes with lead based paint hazards. These are households that have been identified to be living in homes that were constructed before 1980.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

The CNMI estimates about 1,189 families living in homes with lead based paint hazards. These are households that have been identified to be living in homes that were constructed before 1980.

Discussion

The CNMI continues to ensure compliance with Federal and Local statutes concerning lead based paint. CNMI contractors are required to comply with 40 CFR Part 745. The federal law requires contractors performing renovation, repair and painting projects that disturb lead-based paint in homes, child care facilities and schools built before 1978 to be certified and to follow specific work practices to prevent lead contamination. The CNMI continues to address the dangers of lead-based paint in existing and future housing by facilitating the availability of information to homeowners and homebuyers of all income levels. The CNMI ensures that procedures are implemented to provide information to families and individuals on the dangers of lead-based paint before they commence the search for rental housing in the ESG and Section 8 Programs. NMHC also ensures that CDBG-funded projects comply with lead-based paint regulations, and if identified as a lead based paint hazard in rehabilitation projects, mitigation measures are taken immediately.

For CDBG-DR Updates, please see Section MA10 related to this section

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	0	0	363	0	363	0	0	0
# of accessible units	0	0	0	303	0	363	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 35 – Total Number of Units by Program Type

Data PIC (PIH Information Center)

Source:

Describe the supply of public housing developments:

The Northern Marianas Housing Corporation (NMHC) is the Public Housing Agency (PHA) in the CNMI. Under the Section 8 Housing Assistance Payment Program – New Construction – NMHC owns and manages the following four (4) housing developments/project sites in the CNMI:

1. Mihaville Estates – Located on the central region of the island of Saipan;
2. Koblerville Estates – Located on the southern region of the island of Saipan;
3. Tinian Broadway – Located on the island of Tinian; and
4. Rota Blue Bay Homes – Located on the island of Rota.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The Northern Marianas Housing Corporation (NMHC) is the Public Housing Agency (PHA) in the CNMI. Under the Section 8 Housing Assistance Payment Program – New Construction – NMHC owns and operates a total of 118 units throughout the following four (4) housing developments/project sites in the CNMI:

- Mihaville Estates (Saipan) – 48 Units;
- Koblerville Estates (Saipan) – 34 Units;
- Tinian Broadway Estates – 20 Units; and
- Rota Blue Bay Homes – 16 Units Online and 14 Off-Line.

All online units located in the four (4) housing developments/project sites have an average age of 25 years or more with renovations, rehabilitation, and repairs/upkeep being conducted to maintain the longevity of the units. NMHC

has acquired a new Property Manager under the Asset Management Division (AMD) to oversee the operation, upkeep, and maintenance of all NMHC housing developments/project sites. The AMD Property Manager and NMHC staff have conducted on-site, physical needs assessments/inspections for all 132 units to determine and review the current conditions, materials, and structural elements for all NMHC project sites and units. The information gathered was utilized to develop a strategy to effectively and efficiently address identified capital improvement needs, as well as modernization activities to ensure NMHC units are safe, decent, sanitary, and structurally sound.

Currently, there are only sixteen (16) online units at Rota Blue Bay Homes since fourteen (14) units had to be taken off-line due to deteriorating conditions of the units brought about by environmental factors based on the projects site's close proximity to the ocean side on the island. NMHC is exploring options to address these units so that the agency may initiate action to bring the fourteen (14) off-line units back online to regain a total of 132 units. All other NMHC units remain on-line and are well-maintained.

Public Housing Condition

Public Housing Development	Average Inspection Score
Saipan, Tinian, and Rota	66

Table 36 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Under the Section 8 Rental 8 Housing Assistance Payment Program – New Construction – NMHC owns and operates a total of 118 units throughout the four (4) housing developments in the CNMI. NMHC is also working on improving the efficiency of its building maintenance activities so as to shorten the turnaround time needed for vacant units and renovation/repair activities.

Restoration and revitalization needs for are as follows:

- Mihaville Estates (Saipan – 48 Units) – Renovation and modernization of units, site improvements, and landscaping activities to include:
 - a. Weatherization of concrete rooftops (application of elastomeric coating);
 - b. Installation of aluminum sliding windows;
 - c. Repair of perimeter fence line;
 - d. Installation concrete sidewalks; and
 - e. Removal of vegetative materials (i.e. trees, shrubs, etc.) where applicable.
- Koblerville Estates (Saipan – 34 Units) – Renovation and modernization of units, site improvements, and landscaping activities to include:
 - a. Weatherization of concrete rooftops (application of elastomeric coating);
 - b. Installation of aluminum typhoon/storm shutters;
 - c. Repair of perimeter fence line;
 - d. Installation concrete sidewalks; and
 - e. Removal of vegetative materials (i.e. trees, shrubs, etc.) where applicable.
- Tinian Broadway Estates (20 Units) – Renovation and modernization of units, site improvements, and landscaping activities to include:
 - a. Weatherization of concrete rooftops (application of elastomeric coating);
 - b. Repair of perimeter fence line;
 - c. Installation concrete sidewalks; and
 - d. Removal of vegetative materials (i.e. trees, shrubs, etc.) where applicable.

- Rota Blue Bay Homes (16 Units Online and 14 Off-Line) – Renovation/Maintenance of existing units and site improvements. Efforts are being taken to explore opportunities to relocate the project site from Songsong Village to Sinapalo Village; NMHC is exploring opportunities to leverage funds to initiate the relocation process.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

Based on NMHC's Annual PHA Plan, the agency has set the following strategy for improving the living environment of low- and moderate-income families residing in public housing:

- Explore opportunities to leverage funds to create additional housing opportunities;
- Seek additional rental vouchers;
- Increase leasing-up activities;
- Maintain high occupancy rates by decreasing the number of vacant units;
- Continue renovation and modernization efforts for all existing units;
- Increase enforcement efforts;
- Promote Self-Sufficiency and asset development of assisted household;
- Ensure equal opportunity for all persons in need of housing assistance; and
- Achieve a HUD "high performer" rating under the Section 8 Management Assessment Program (SEMAP)

MA-30 Homeless Facilities and Services – 91.210(c)**Introduction****Facilities and Housing Targeted to Homeless Households**

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	12				
Households with Only Adults	0				
Chronically Homeless Households	0				
Veterans	0				
Unaccompanied Youth	32				

Table 37 - Facilities and Housing Targeted to Homeless Households

There are currently no transitional housing or permanent supportive housing facilities in the CNMI. The data inputted in the table are the number of year round beds. Voucher/seasonal/overflow beds does not apply to the only (2) shelters on island which are considered emergency shelters—Guma Esparansa Shelter and the Division of Youth Services Shelter. There are no emergency shelters that specifically serve the chronically homeless households and veterans. Figures that are indicated for household with adult(s) and child(ren) are derived from the Guma Esparansa Shelter (domestic violence shelter for women and children), figures identifying the unaccompanied youth is derived from the Division of Youth Services Shelter.

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

As mentioned in several sections of the Plan, unlike Guam, its neighboring island, the CNMI does not have specific services targeted just to homeless persons with exception of NMHC, Karidat Social Services, Division of Youth Services Shelter (for children/youth without shelter due to child abuse and neglect) and the Guma Esperansa Shelter (domestic violence shelter). The health, mental health, and employment services target the CNMI population as a whole, of which some of the programs are income-based (must meet the low-mod income threshold according to their Grantor agency). The Karidat Social Services, a non-profit organization, distributes monthly hotel vouchers, funded by the United Way, to homeless households, and as a Subgrantee of ESG funds, Karidat Social Services manages the program. Through the ESG program, eligible households (for rapid re-housing or homelessness prevention assistance) are provided with financial assistance such as rental assistance, utility deposits, and utility allowance. The Division of Youth Services Shelter provide services to unaccompanied children and youth who find themselves homeless due to child abuse and neglect or to unaccompanied youth who ran away from home. The Shelter conducts intake and provides food/water and housing until the child or youth is safe to exit the Shelter. The Guma Esperansa Shelter serve women and children who find themselves homeless due to domestic violence. The Shelter conducts intake and provides food/water and housing until the family is safe to exit the Shelter.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

****The services that the Shelters (outside of NMHC) provide are listed above.**

Information System

- **Homeless Management Information System** – human service database that collect and deliver timely, credible, quality data about services and homeless persons. This system allows service providers to utilize data for accurate referral, placement, and effective case management. *Managed by the Northern Marianas Housing Corporation. ESG-funded: PY 2020- \$8,000*

CNMI's (NMHC) Entitlement Grants

Emergency Solutions Grant

- **Homeless Prevention** – individuals and families who are at-risk of becoming homeless are provided assistance such as security and utility deposits, rental and utility arrears, and up to 24 months of rental and utility payments. Persons receiving assistance are also provided case management and other support services for families to achieve housing stability. *Administered by the NMHC since FY 2018. Funds Allocated PY 2020: \$25,413; CNMI is allocating 60% of CDBG funds to homelessness prevention assistance*
- **Homeless Assistance** – individuals and families who are sleeping on the streets or exiting emergency shelters are assisted with security and utility deposits, rental and utility arrears, and up to 24 months of rental and utility payments. Persons receiving assistance are also provided case management and other support services for families to achieve housing stability. *Subgranted to Karidat Social Services. Funds Allocated PY 2020: \$38,119.20*
- **Planning and Administrative Costs:** To administer the program; *Funds allocated PY 2020: \$5,973.30*

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

This section discusses the various facilities and services available to assist persons who are not homeless but require supportive housing and programs ensuring persons returning from mental and physical health institutions receive appropriate supportive housing.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Description

Elderly (62 years and older)

HUD defines an elderly to be an individual who is 62 years and older; however, the CNMI Census 2010 data tallies the population for 60 years and older. Based on the 2010 Census data for the CNMI, of the total population 60 years and older, 16% are below the poverty level, and 19% of the population have a disability.

There was also a 59% increase in householders whose age ranged from 65-74 years old in renter-occupied units, while there was a 29% increase in householders within the same range in owner-occupied units. As with the elderly population, for those ages 75-84, there was a 50% increase in householders since 2000 and a 31% increase for those 85 and over in owner-occupied units. For the renter-occupied units, there was an increase 36% increase in householders ages 75-84, and a 50% increase in householders ages 84 and over.

Persons with Alcohol or Other Drug Addiction

The most recent data for FY 2019 gathered from the Community Guidance Center of the Department of Public Health that during the year, a total of 27 individuals were identified to have alcohol or other drug addiction. Data is categorized into the particular disorder, gender, and age group: (IDIS) See appendix ____ for table.

Table 1. Clients/Consumers with Substance Use Disorders by Gender for 2019

	Female	Male	Grand Total
Alcohol Use Disorders	4	35	39
Alcohol-Induced Disorders		2	2
Amphetamine Use Disorders	5	36	41
Cannabis Use Disorders	4	17	21
Cannabis-Induced Disorders		1	1
Hallucinogen Use Disorders		1	1
Nicotine Use Disorder	1	2	3
Polysubstance-Related Disorder		1	1
Grand Total	14	95	109

Source: CGC Database

Table 2. Clients/Consumers with Substance Use Disorders by Island for 2019

	Rota	Saipan	Tinian	Grand Total
Alcohol Use Disorders	2	35	2	39
Alcohol-Induced Disorders		2		2
Amphetamine Use Disorders	1	39	1	41
Cannabis Use Disorders	2	18	1	21
Cannabis-Induced Disorders		1		1
Hallucinogen Use Disorders		1		1
Nicotine Use Disorder		3		3
Polysubstance-Related Disorder		1		1
Grand Total	5	100	4	109

Source: CGC Database

Table 3. Clients/Consumers with Substance Use Disorders by Age Group for 2019

	18-24 Year	25-44 Year	45-64 Year	Grand Total
Alcohol Use Disorders	4	26	9	39
Alcohol-Induced Disorders		2		2
Amphetamine Use Disorders	2	31	8	41
Cannabis Use Disorders	4	15	2	21
Cannabis-Induced Disorders	1			1
Hallucinogen Use Disorders		1		1
Nicotine Use Disorder		2	1	3
Polysubstance-Related Disorder		1		1
Grand Total	11	78	20	109

Source: CGC Database

Persons with Disabilities

Of the total civilian non-institutionalized population, 5% of adults 18 years and older have a disability and 1% of children under the age of 18 are disabled. Of the total civilian non-institutionalized population who are 65 years and older, 1% have a disability. According to the U.S. Census Bureau, 2010 CNMI Census, only 42% of disabled adults are employed while 83% of non-disabled adults are working.

According to HUD, a chronically homeless individual or in the case of a family household, an adult head of household (or if there is no adult in the family, a minor head of household) who (i) is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and (ii) has been homeless and living

or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years; and (iii) can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Right Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability. The CNMI has not conducted a PIT survey and therefore, cannot input any data with regards to the # of chronically homeless persons in the CNMI.

Persons with HIV/AIDS and Their Families

The Point Prevalence of persons living with HIV in the CNMI today is 33. Cumulatively, there have been 30 persons diagnosed with HIV in the CNMI since 1997. (Data collected from the Communicable Disease Division of the Department of Public Health). Many of the diagnosed individuals live with family who help take care of their needs.

Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking

Data gathered from Guma Esperansa Domestic Violence Shelter, reflects a total of 384 women and 1 man, with 392 children who were victims of domestic violence, Sexual Assault and Human Trafficking were served (from years 2015-2018). This is a significant number with relation to the small population of the CNMI, compared to other island jurisdictions. The Guma Esperansa Shelter provides shelter, food, and supportive services for victims, and the CNMI Coalition Against Domestic Violence is a non-profit entity which works to fulfill this mission by addressing the issues of domestic violence and sexual assault through community outreach efforts, providing training to service providers and responders, nurturing meaningful partnerships with groups or individuals, as well as working to create social change. Those who have exited the shelter have sought housing assistance from the Section 8 programs and Karidat Social Services' short-term rental assistance programs.

Services

Elderly (62 years and older)

In 2010, the total population of the CNMI declined by 30%. The total number of senior citizens from age 60 and up increased by 18% which also comprises 6.7% of the total population in 2010. NMHC, the only designated Housing Authority in the CNMI, provides housing needs to elderly clients. In the Section 8 and HCVP Program, being Elderly is one of the preferences for those applying for housing assistance. The Mortgage and Credit Division continues to offer grant assistance for the rehabilitation, new construction or acquisition of a home for elderly clients who meet the eligibility criteria. NMHC is prioritizing the elderly and persons with disabilities (first time homeowners) in the CDBG-DR Loan Program for those whose homes were damaged by Super Typhoon Yutu or Typhoon Mangkut. The elderly and persons with disabilities may also construct a new home or acquire a home with the loan or a grant. Several programs provided are the following: Computer Literacy Class, Music Class, Health Walk, Water Therapy, Cultural Tutorial, and a variety of recreational activities. The Office of the Aging also provide the clients they serve with the resources they need to maintain physical, mental, psychological, social, and emotional well-being.

Persons with Disabilities

MultiFamily Units

NMHC is allowed up to (132) vouchers for the MultiFamily Program. There are currently 118 occupied units in the MultiFamily Program- 82 units on Saipan, 20 units on Tinian, and 16 units on Rota. Of the 118 total units, there are 9 ADA units- 7 units on Saipan, 2 units on Rota, and 1 unit on Tinian. In addition, one of the preferences are for the households with member with a disability. The Northern Marianas Protection and Advocacy Systems, Mental Health Planning Council,

Office of Vocational Rehabilitation, and Council on Developmental Disabilities provide a variety of supportive services for persons with disabilities. As mentioned above, NMHC is prioritizing the elderly and persons with disabilities (first time homeowners) in the CDBG-DR Loan Program for those whose homes were damaged by Super Typhoon Yutu or Typhoon Mangkut. The elderly and persons with disabilities may also construct a new home or acquire a home with the loan or a grant.

Homeless Programs

The CNMI does not operate supportive housing beds for homeless individuals and families with disabilities. However, through the ESG Program, subgranted to Karidat Social Services (up until April 2018), rapid re-housing and homelessness prevention assistance is given to homeless and at-risk families, some of which have a disability. Of the average number of families (6 families per year), at least 1 of the families have a disability. On May 29, 2018, The Northern Marianas Housing Corporation started administering the program.

Persons with Alcohol or Other Drug Addiction

The CNMI does not operate homeless programs specifically targeting persons with alcohol or other drug addiction. These particular persons receive treatment and supportive services through the Community Guidance Center of the Department of Public Health. Supportive services include:

- Substance abuse individual counseling
- Substance abuse group counseling
- Individual and group counseling addressing gambling addiction
- Family education/counseling regarding substance abuse
- Work with Behavioral Health Services to address Co-occurring Disorders
- Drug-Free Workplace Program Supervisory Training
- Drug-Free Workplace Program Employee Education

Persons with HIV/AIDS and Their Families

The CNMI does not receive HOPWA (Housing Opportunity for Persons with AIDS) funds through HUD. However, it does receive federal funds for the Ryan White HIV/AIDS Program (RWHAP) which is managed through the Department of Health. This program provides medical case management, primary care, and other supportive services for low-income and underinsured individuals with HIV/Aids. In the CNMI, to date, a total of 33 persons were diagnosed with the virus.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The CNMI Department of Corrections (DOC) and the Department of Public Health through the Community Guidance Center and Mental Health Ward of the Commonwealth Healthcare Corporation are responsible for coordinating and identifying permanent housing according to their Department's Discharge Policy.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

- ESG funds will be utilized for the CNMI's Homeless Management Information System (HMIS), the CNMI's only comprehensive data collection system that is designed to collect and track the housing and support services provided to homeless clients through the various homeless service providers. This program is managed by the Northern Marianas Housing Corporation.
- ESG funds will be utilized to provide security and utility deposits, rental or utility arrears, monthly rental and utility payments to prevent eligible households from becoming homeless or to rapidly re-house homeless individuals and families living on the streets or in one of the CNMI's emergency or transitional housing programs. Since 2019, NMHC has been administering the ESG Program.
- HOME funds will be utilized to rehabilitate the homes of income eligible homeowners so their homes are brought to building code compliance and are rehabilitated with energy efficient fixtures.
- HOME funds will be utilized to provide income eligible households, including those that need housing and supportive services, with homeownership opportunities (new construction or acquisition)

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

As an entitlement grantee, the CNMI will undertake the activities mentioned above during the First Year Action Plan.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Minimum Wage & Employment

The CNMI's current minimum wage is \$7.25 per hour. The current minimum wage does not allow room for families build or acquire an affordable home. The high cost of utilities, food, fuel, and other commodities are preventing families from affordable housing. Many households that cannot afford to obtain a decent home choose to live in substandard homes that do not have the proper sanitary facilities and adequate number of rooms to accommodate their household size. Developers attributed this increase to several factors including the rising cost of labor, materials, land, and utilities.

Construction Costs

A significant barrier to producing more affordable housing is the rising cost of development and the limited foreign labor capacity in the CNMI. The CNMI being geographically located in typhoon alley calls for stringent building codes to withstand severe weather, with winds of close to 200 MPH as demonstrated by Super Typhoon Yutu. According to NMHC's Asset Management Division, the average cost of construction is \$191,952 (CMU block concrete foundation), which has nearly tripled from 2015. Labor costs have directly impacted the cost of construction: The provisions of US Public Law 110-229 which phases out the CNMI's non-resident labor pool, commonly referred to as a "Commonwealth Worker" or "CW", have created an unprecedented labor quandary which has negatively impacted the CNMI's private sector. Coupled with this mandated reduction of foreign sourced labor is a significantly small populous resulting from out migration prompted by the jurisdiction's previous economic downturn. According to the 2010 CNMI Census, the CNMI's population declined nearly 22% from the previous decade, further shrinking the available labor pool required to support a recovering economy. According to the Government Accountability Office's (GAO) report, the elimination of the CNMI's non-resident labor pool would result in maximum 62% decrease in Gross Domestic Product (GDP). Given the current and projected demand for labor, the size the CNMI's domestic workforce and the uncertainties of continued extensions of the CW program, it is critical for the CNMI to properly plan and strategize its economic course.

Challenges faced by Persons with Disabilities

NMHC in collaboration with the Northern Marianas Protection and Advocacy System, Inc. (NMPASI) and Council for on Developmental Disabilities (CDD) identified the challenges encountered by individuals with disabilities. People with disabilities are suggesting that the program be brought to them. The following challenges were noted by the their case manager at NMPASI: income criteria should be adjusted to reflect the current cost of living in the CNMI, timeframe to be given for people who are on the program, increased utility allowance to reflect the high cost of utilities in the CNMI, and provide home service to individuals with disabilities. The Council on Developmental Disabilities has identified the following barriers that persons with disabilities are faced with: application documents are not accessible for visually impaired, need to provide transitional homes and expand rental housing for those who are homeless, in addition to the waiting list (for Section 8 programs) being too long, and the need to enforce Fair Housing Act of 1998.

In addition to the Barriers To Affordable Housing above, NMHC completed its Analysis of Impediments to Fair Housing on July 27, 2020. See Appendix ____.

MA-45 Non-Housing Community Development Assets – 91.215 (f)**Introduction**

Note: The CNMI is not included in the American Community Survey and therefore must rely on Census data to obtain specific information, some of which cannot be found in the Census. NMHC inputted all data that can be attainable from all sources of information. NMHC indicated “unavailable for the CNMI” for information that is not traceable to any sources of information.

Economic Development Market Analysis**Business Activity**

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	472				
Arts, Entertainment, Accommodations	5,519				
Construction	1,786				
Education and Health Care Services	3,085				
Finance, Insurance, and Real Estate	1,064				
Information	496		Data Unavailable for CNMI		
Manufacturing	689				
Other Services	2,553				
Professional, Scientific, Management Services	1,974				
Public Administration	2,414				
Retail Trade	2,645				
Transportation & Warehousing	1,067				
Wholesale Trade	700				
Grand Total	24,464				

Table 38 - Business Activity

Data Source: U.S. Census Bureau – 2010 CNMI Census – Industry

Labor Force

Total Population in the Civilian Labor Force	27,968
Civilian Employed Population 16 years and over	24,826
Unemployment Rate	11.2%
Unemployment Rate for Ages 16-24	28.9%
Unemployment Rate for Ages 25-65	9.2%

Table 39 - Labor Force

Data Source: U.S. Census Bureau – 2010 CNMI Census – Labor Force 2010

Occupations by Sector	Number of People
Management, business and financial	3,355
Farming, fisheries and forestry occupations	313
Service	7,417
Sales and office	5,024
Construction, extraction, maintenance and repair	1,709
Production, transportation and material moving	2,072

Table 40 – Occupations by Sector

Data Source: U.S. Census Bureau – 2010 CNMI Census – Occupations

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	20,994	91.03 %
30-59 Minutes	1,999	8.67 %
60 or More Minutes	69	0.30 %
Total	23,062	100.00 %

Table 41 - Travel Time

Data Source: U.S. Census Bureau – 2010 CNMI Census – Travel Time to Work for Workers 16 Years and Over

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	2,660	879	3,315
High school graduate (includes equivalency)	9,290	1,292	3,145
Some college or Associate's degree	7,010	638	1,721
Bachelor's degree or higher	5,746	203	816

Table 42 - Educational Attainment by Employment Status*Data Source: U.S. Census Bureau – 2010 CNMI Census – Educational Attainment and Sex by Labor Force Status*

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	109	315	552	1,129	554
9th to 12th grade, no diploma	1,010	815	1,023	1,178	171
High school graduate, GED, or alternative	1,672	2,377	4,007	5,309	370
Some college, or Associate's Degree	1,156	1,948	2,998	3,063	208
Bachelor's degree	168	1,241	1,908	2,085	149
Graduate or professional degree	17	229	335	524	114

Table 43 - Educational Attainment by Age*Data Source: U.S. Census Bureau – 2010 CNMI Census – Educational Attainment and Sex by Age*

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	\$8,105
High school graduate (includes equivalency)	\$9,308
Some college or Associate's degree	\$10,661
Bachelor's degree	\$13,141
Graduate or professional degree	\$40,481

Table 44 – Median Earnings in the Past 12 Months

Data Source: U.S. Census Bureau – 2010 CNMI Census – Median Earnings in 2009 (dollars) by Sex by Educational Attainment for the Population 25 Years and Over with Earnings.

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Describe the workforce and infrastructure needs of the business community:

The ratio of United States workers to foreign workers in the CNMI remained close to 50 percent from 2014 through 2018, with United States workers making up 49 percent of the workforce in 2018, according to CNMI tax data. The size of the workforce grew each year from 2014 through 2017, before contracting by almost 2,000 workers in 2018. For 2018, the Department of Homeland Security approved about 9,000 CW-1 foreign worker permits, and approved more than 11,000 permits for 2019. Furthermore, the CNMI expects close to half a billion dollars worth of public assistance, hazard mitigation, and CDBG-DR funded projects to launch within PY 2021. Therefore, the CNMI government is strengthening its efforts to train locally and work with US-based contractors to supplement the significant labor force shortage that may occur. Numerous skills sets are needed for the hospitality and service industry and ancillary sectors that supports these expanding industries. With the growing private sector economy, the CNMI has been planning and discussing with numerous developers and regulatory agencies to include its own government leadership of the need to review the current infrastructure of the CNMI and its relevance and/or expansion to be able to support its growing private sector industries. Power, water, sewer, roads, hospital, airport, schools, and many more all require dedicated attention to ensure that the CNMIs current economic expansion does not place additional stress on the current infrastructure and if so not capable then serious planning and funding are the key issues being currently addressed by the CNMIs Strategic Economic Development Council. The CNMI has allocated an estimated \$100M of CDBG-DR funds and an estimated \$1.2M of CDBG-DR funds to address infrastructure and workforce development needs that were severely impacted from Super Typhoon Yutu.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Access to a Skilled Domestic Labor Pool: The minimization and eventual elimination of the CNMI's foreign labor source by 2029 continues to present a significant threat for the CNMI's economic condition. The jurisdiction must contend with replacing thousands of workers in a market of which labor demand far exceeds its available supply. In previous periods of economic upturn, the CNMI could source labor from surrounding Asian markets at a low-cost, however provisions of US Public Law 110-229 prohibit the long-term use of this practice. The reduction of its foreign labor source coupled with

increased economic activity, both in the CNMI and Guam, presents a dynamic that can escalate development costs in the CNMI. While Department of Defense projects within the region are anticipated to serve as a further pull on the CNMI's labor pool, this dynamic is mitigated through Congressional provisions to allocate H-2B slots for military-related projects in Guam and the CNMI. **10-year Extension of US Public Law 110-229:** Despite the 2018 extension of the CW-1 program through 2029, a future foreign labor phase-out still provides uncertainty to current residents and for the overall workforce. Although the statutory expiration has been extended, it is unclear if the CNMI's current economic rebound would be dampened without additional relief. A workable and permanent solution to this threat to the CNMI's economic condition can only be achieved through Congressional action. **National Policy Shifts Restricting Source Market Access:** While much of the CNMI's economic threat derives from federal provisions, the global political landscape also serves as a threat to the jurisdiction's economic outlook. Should diplomatic relations between the United States and nations that host CNMI's tourism market segments sour, the CNMI would be left to contend with replacing entire market segments without advanced warning or transition. The anticipated increase in Department of Defense assets within the region may serve to increase US restrictions, which can be detrimental to the CNMI's economy. Provisions which are well intentioned to protect US assets may also serve to the detriment to the CNMI's economic well-being by placing additional restrictions on source country travel and/or investment. (Data extracted from the Comprehensive Economic Development Strategy (CEDS) Update in 2019)

In addition, the growing economy of the CNMI, due to the millions of federal funds being allocated to the CNMI for Disaster Recovery and to address the coronavirus pandemic, and the insufficient number of US workers within its jurisdiction is a concern to the CNMI and the need for more workers to support the growing economy requires attention at both the local and national levels of government. The CNMI's location, natural resources, current and future economic developments will all be affected one way or another. These two factors of great significance will have an impact on the CNMI's potential for more economic investments with subsequent effects and expectations of jobs creation and growth and opportunity to become self-reliant.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

The CNMI has a very high secondary education graduation rate of 96+%. Though the Micronesian jurisdiction have Tourism as its main economic driver, there are substantial differences in wage pays that most often than not except for Guam are unattractive to the workforce of the CNMI. The skills and education of the CNMI's workforce is primarily responsive to the needs of its regional employment opportunities in many entry level occupations while areas that require higher education and work experience is nominally present as opportunities such as those in engineering fields or the health related professions that require long term education and vast experience.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The CNMI is focused and determined to develop its workforce with the talent and skills necessary to compete and succeed in meaningful and sustainable jobs. Numerous workforce training initiatives are in place designed to respond to and support the CNMI's transforming workforce landscape. Sector training initiatives is the main focus of the CNMI's training development and design that will populate the primarily the private sector pipeline of its economy and other sectors that are considered demand driven. These training initiatives are delivered through numerous partners within the CNMI's workforce system such as NMC, NMTI, and PSS. Initiatives such as the Saipan Southern High School Nursing Assistants Program is administered at the high school level in partnership with the CNMI DOL WIA Program, PSS, and NMC. This program is intended to target the growing need of health care providers in the CNMI. Another training initiative is the trades training program administered through the Northern Marianas Trades Institute which focuses on NCCER certified classroom curricula and hands on trades related occupational trainings.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)? Yes, the CNMI participates in CEDS.

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Discussion

In 2011, the CNMI held an Economic Restoration Summit (ERS), and although the ERS was geared towards the diversification of economic drivers in the CNMI as a whole, the distinct economic conditions of each respective islands were also considered when assessing the viability of a specific industry. The Economic Restoration Summit is comprised of a public session which solicited ideas, comments, and recommendations from the general public on the islands of Saipan, Tinian, and Rota. The public session was then followed up with an Economic Development Forum in 2013, which brought the recommendations of the public session to policy makers in an effort to solicit ideas, policies, and practices that could aid in the development of the identified industries. The CEDS 2019 Update was precipitated by the landfall of Super Typhoon Yutu on October 25, 2019. As reported by national news, it was the strongest storm to hit US soil since 1935. This disaster destroyed over 1,700 homes on Saipan and Tinian, filling emergency shelters and wreaking havoc on infrastructure on both islands. Power was disrupted across the impacted islands and flooding and storm surge overtopped and damaged roads. Initial situation reports documented “extensive damage to critical infrastructure” including lighting and loading bridge loss at airports leading to the suspension of flight activities, “no movement” in or out of the port, and the interruption of services at the Tinian Health Center due to major flooding and damage. The tremendous destruction and economic disturbance prompted EDA to reach out to the CNMI’s leadership to encourage an update of the CEDS. Agencies were asked to revisit prior submissions and remove projects that had been implemented and add newly identified needs. The Office of Planning and Development was tasked with coordinating this effort with the Planning and Development Advisory Council (PDAC) and partners, a conversation which complemented ongoing dialogs focused on supporting CNMI’s first comprehensive sustainable development plan. Principles identified in the CNMI’s 2018 Smart, Safe Growth guide are already being applied to enable initial steps in long-term sustainable development planning, which encompasses the built, natural, and socio-economic environments. As Super Typhoon Yutu demonstrated, preparedness for catastrophic disturbances is an integral part of risk reduction that enhances overall community resilience and wellbeing. These principles are being incorporated into discussions of comprehensive sustainable development and recovery planning being coordinated by the Office of Planning and Development. This and future CEDS updates will provide an essential component of the Comprehensive Sustainable Development Plan that is being developed for CNMI and slated for initial release in 2020.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

There is no one area in the CNMI that can be identified as a concentrated area with multiple housing problems. Data analyzed indicate that all areas in the CNMI have a relatively equal share or distribution of housing problems, where one or more of a certain problem exists. But, relative to island population, 90 percent of the CNMI's households reside in Saipan. It is the most populated island in the CNMI. According to the U.S. Census Bureau, 35 percent of owner-occupied households and 65 percent of renter-occupied households live below the poverty level in the island of Saipan alone. Since there is a close correlation between population and housing problems where there is a densely populated residential area that there is the probability that housing problems are abundant. As such, it becomes clear in this analysis that the island of Saipan holds the highest concentration of housing problems within the CNMI.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

As previously discussed, racial segregation in the CNMI housing market is not evident, as rental housing is accessible to all ethnic groups. No particular area, district, or village in the CNMI had a high concentration of any one ethnic group to exclusion of another. Again, the CNMI has four distinct groups of housing consumer with different needs, resources and opportunities: 1) Migrant workers mostly from Asia, 2) U.S. Indigenous Chamorros and Carolinians, 3) U.S. Citizens not of CNMI descent, and 4) Immigrants from the Federated States of Micronesia. Among the four groups, the Migrant workers occupy the highest percent of all housing units, and comprise the highest share and numbers of persons living below poverty. Although discouraged by CNMI property alien laws from homeownership, U.S. citizens not of CNMI descent, representing less than 8 percent of all households, generally have sufficient incomes to locate adequate and affordable housing in the rental market. Few of these households are estimated to be living below the poverty level and in need of rental housing assistance on an annual basis. In contrast, most immigrant Micronesian households are not in position to afford adequate rental housing. While only comprising about 7 percent of all CNMI households, an estimated 57 percent of all Micronesian households are living below poverty, and are in need of rental assistance on an annual basis. In fact, the majority of the NMHC Section 8 clients are Micronesian households. Chamorros and Carolinians, as CNMI descendants, are eligible under CNMI law to own land fee simple, and are further encouraged into homeownership through the Homestead program. Almost half of these estimated 4,500 to 5,000 households are very low, low-income households. Approximately 27 to 30 percent of all CNMI descendant households are living below poverty. Chamorro and Carolinian renter households living below poverty will continue to need rental assistance on annual basis. It is estimated that 1,800 to 2,300 Chamorro and Carolinian renter households are eligible for homeownership. This is a conservative estimate, given the number of homestead applicants now estimated at over 4,000. The homeownership rate for indigenous ethnic groups will continue to increase in the next five years. Most, if not all, of these new homeowners and about 1,500 or about 50 percent of existing Chamorro and Carolinian owner-occupants will need housing loan assistance either for new housing construction or housing rehabilitation. On an annual basis, it is estimated that about 50 percent of low-income new homeowners will need mortgage lending assistance.

What are the characteristics of the market in these areas/neighborhoods?

The characteristics of the market are reflected through a combination of housing problems such as the lack of plumbing, kitchen facilities, crowding, and cost burden issues. In the CNMI, these housing problems are most likely widespread across the largest Homestead Villages. For instance, the Kagman homestead village, when combining Kagmans I, II, III, and IV the largest homestead residential area and population in the CNMI, which is estimated at 4,194. The village of Dandan on Saipan's southern end is the second largest and most populated homestead village at 3,280, and then followed by Koblerville, with a population of 2,493 and placing third among the most densely populated residential areas in the CNMI.

Are there any community assets in these areas/neighborhoods?

From 2016-2019, NMHC allocated about \$447,432 into the rehabilitation and expansion of the Kagman Community Center and allocated \$570,640.05 in the rehabilitation of the Koblerville Youth Center, and within the same years, an amount of \$447,432 was allocated to the rehabilitation and expansion of the Koblerville youth Center. In addition, from 2009, since the inception of the NSP Program, NMHC rehabilitated 14 homes in the Kagman area to resell to HOME-eligible clients. In the village of Koblerville and Dan Dan, there was one NSP-assisted unit in each village. Those homes are currently occupied.

Are there other strategic opportunities in any of these areas?

With the growing population in Kagman and its distance from many amenities, through the years, it has become the most developing village. In the village, there is a hotel and golf resort, elementary, junior high, and high schools, a fire station, community center, community parks, several grocery stores, churches, an eye clinic, and a medical clinic. Since PY 015, a total of four LIHTC housing projects have developed, with one pending, in the amount of \$110M, with a total of approximately 232 units, and are in close proximity with the villages of Kagman, Koblerville, and Dan Dan.

Disaster Recovery Data was extracted from the CDBG-DR Action Plan: Two of the three islands (Saipan and Tinian) are in a HUD identified “most impacted and distressed” area. FEMA and the local assessment of unmet needs are the basis for the development and prioritization of recovery activities in the CNMI jurisdiction. Figure 22 below provides a summary to demonstrate the connection to address the unmet need. Through these funds, the CNMI primarily intends to address unmet housing needs supported by infrastructure and economic development.

Overall, the economy and the sustainability of neighborhoods is needed to prevent further decline to the housing market since the typhoons hit. A majority of project funds is allocated to housing. Infrastructure and economic development activities are needed to support the recovery efforts for housing by providing the following:

- ▶ Adequate infrastructure including roads, utilities, port, and public facilities will be required to support the proposed housing programs for rehabilitation, reconstruction, and new construction.
- ▶ Economic Revitalization activities help to create and retain jobs in the community, helping households stabilize their employment and/or by increasing their income. Workforce development as part of economic revitalization will provide local citizens with the training needed to become skilled workers thereby, allowing local citizens to attain lifelong workplace skills and to be competitive in the job market.
- ▶ Long term recovery cannot be sustained without the combination of housing, infrastructure, and economic development activities.
- ▶ CNMI housing programs will be complemented by a broad approach to infrastructure to help stabilize households and return families to re-establish communities.
- ▶ Preparedness and mitigation measures considered for housing supported by infrastructure and economic development programs and projects will ensure residents of the Islands especially the Saipan and Tinian MID areas create safer and more resilient communities and neighborhoods post-storm.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The CNMI Government continues to be the designated recipient of the U.S. Dept. of Housing and Urban Development (HUD) Community Planning and Development grant funds for the Commonwealth of the Northern Marianas Islands (CNMI). The Governor has delegated the NMHC, a local, autonomous, government agency, to administer HUD CPD funds to ensure compliance with grant regulations. This Annual Action Plan report documents the CNMI's proposed use of the U.S. Department of Housing and Urban Development (HUD) Community Planning and Development (CPD) funds for the Program Year 2020. Program Year (PY) 2020 equates to Fiscal Year 2021 (October 1, 2020 - September 30, 2021) to address priority needs and goals of the community for housing, services, and community facilities serving low and moderate income populations. These priority needs and goals are documented in the CNMI's draft 5-year plan, the Consolidated Plan PY2020-2024 (the ConPlan). The CNMI will pursue goals such as the funding of economic development projects to provide economic opportunities such as job creation or retention for low-mod income households. In addition through the ESG and HOME Programs, the CNMI will address the housing needs of low-income households by providing rental assistance through the ESG Program and home ownership and home rehabilitation opportunities through the HOME Program. PY2020 represents the first year of the draft ConPlan.

The CNMI receives three entitlement. The CNMI is an annual recipient of entitlement funds and is eligible to compete nationally for use of the competitive grant funds. Entitlement grants include the Community Development Block Grant (CDBG), HOME Investment Partnership Grant (HOME), and Emergency Solutions Grant (ESG).

Past performance is evaluated by a performance measurement system that gauges the goals, objectives, outputs and outcomes. The Community Planning Development (CPD) program is substantially on schedule in achieving its stated goals and objectives. At the end of the program year, the CNMI completes a report reflecting the output data of the projects which is compiled with other projects in the Consolidated Annual Performance and Evaluation Report (CAPER) and input into HUD's Integrated Disbursement and Information System (IDIS).

In its first ConPlan year, the CNMI proposes to utilize CDBG funds to rehabilitate the Tinian Children's Park and to purchase wildland trucks and personal, protective equipment for the Department of Fire and Emergency Personnel.

ESG funds are proposed to continue providing financial assistance to persons experiencing homelessness or are most at-risk of becoming homeless with a primary focus on rapid re- housing.

The CNMI continues to identify projects that will greatly contribute to the welfare of individuals and families in the community with a focus on low-and moderate-income persons.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 45 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The CNMI does not allocate investments based solely on geographical location. The greatest, beneficial impact is considered when evaluating project proposals. Since the CNMI's population is smaller than most island territories, projects will impact the CNMI community entirely. Although projects are situated in specific villages, residents from other areas of the island will utilize the project as well. Due to the islands' land mass (Saipan, Tinian, and Rota) and population, each municipality's residents are in close proximity to recreational facilities, public services, and public facilities, in general. Based on the Census 2010 low-mod data by the American Community Survey, Saipan's population is 47,066 of which 39,789 or 84.5% are low-mod income. Tinian's population is 2,444 of which 2,076 or 84.9% are low-mod income. Rota's population is 2,802 of which 2,367 or 84% are low-mod income. It is understood that the low-mod percentage of the project beneficiaries should be more than 51%. A needs' assessment is also conducted during the project evaluation process. Activities are targeted for geographic service areas where the need is greatest and where the greatest impact will be.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 46 – Priority Needs Summary

1	Priority Need Name	Non-housing Community Development
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Individuals Mentally Ill Victims of Domestic Violence Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Non-housing
	Geographic Areas Affected	Entire villages or Tracts or Block Groups identified as meeting HUD's requirement of serving an area where at least 51% of residents are low-and moderate-income
	Associated Goals	<ul style="list-style-type: none"> • Infrastructure Improvement • Job Creation/Retention • Public Facilities • Public Services • Community Enhancement
	Description	Non-housing community development consists of activities that encompass the acquisition, rehabilitation, or construction of structures for use as public facilities, improvements to the public infrastructure and projects that will enhance the community.
	Basis for Relative Priority	The CNMI continues to identify the need for non-housing community development such as improvements to village recreational facilities or the creation of such facilities in low-and moderate-income neighborhoods, improvements or new construction to safety facilities such as fire stations, promotion of energy efficiency in public facilities due to the significant utilities' cost in the CNMI, and improvements to the island's infrastructure, such as the repair of roads and drainage systems that will support housing and enhance resiliency against future disasters.

2	Priority Need Name	Homelessness
	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	CNMI (Island wide)
	Associated Goals	<ul style="list-style-type: none"> • Community Enhancement • Provide Services to Homeless Families (Rapid Re-housing and Homelessness Prevention) • Promote Fair Housing
	Description	<p>First, a priority need of the CNMI is to continue the administration of the ESG program which provides financial and housing relocation and stabilization assistance to literally homeless and at risk of homelessness individuals. In addition, the CNMI plans to conduct a point in time survey of the homeless population (including those with special needs) in order to apply for the Continuum of Care Program to effectively address the homeless need in the CNMI. This priority need addresses a variety of activities that will contribute to the prevention of homelessness in the CNMI. Although the literally homeless population is quite small compared to the island of Guam, the problem still exists, and it is NMHC's goal to ultimately end this problem before it becomes difficult to control. The CNMI will focus on activities that serve special needs populations that include supporting the operations of facilities providing services, supporting the work of organizations that sustain living environments and enhance the quality of life for special needs populations, and support the work or</p>

	Basis for Relative Priority	There are close to 302 households, comprised of 1,207 persons who were counted and identified as homeless or at risk of homelessness. In addition, there are about 202+ households on the Section 8 HCV waiting list and 500+ on the Multi-Family waiting list who are in need of housing assistance. The need is based on the collection of data gathered from the most recent PIT count led by NMHC, in the homeless programs we've administered, including the Section 8 HCV and MultiFamily Programs for those in need of housing assistance.
	Priority Need Name	Affordable Housing
	Priority Level	High
	Population	CNMI (Island wide)
	Geographic Areas Affected	Extremely Low Low Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence
	Associated Goals	<ul style="list-style-type: none"> Promote Fair Housing Sustain Affordable housing stock
	Description	It is one of NMHC's goals to provide loans through the HOME Program to low-income families and those individuals with special needs for the construction (or acquisition) of housing units which would give them the opportunity of homeownership. With this, NMHC will continue to refine its homeowner education and counseling for first-time homebuyers. NMHC also aims to rehabilitate housing units on an annual basis for low-income households, including those with special needs, to bring their homes up to safe, sanitary, and decent living standards, also rehabilitating the home to meet ADA standards. The goal is to rehabilitate up to 3 homes in the next year, and construct or enable eligible households up to 3 homes in the next year (with prior years' residual funding). Through the ESG program, the CNMI will continue to assist at least 6

	Basis for Relative Priority	There are 202+ households on the Section 8 HCV and Multi-Family waiting list and 562+ on the HOME Program waiting list. The PIT count conducted in 2020 found that 302 households, comprised of 1,207 persons were either literally homeless or at risk of becoming homeless. A majority of these households include members who are elderly, members who are victims of domestic violence, veterans, and those who are homeless and in need of housing assistance.
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Narrative (Optional)

SP-30 Influence of Market Conditions – 91.215 (b)**Influence of Market Conditions**

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The TBRA program may be valuable for families in the CNMI and may be considered in the future as an option over families that are currently on the waitlist under the Housing Choice Voucher Program (HCVP). There are about 202+ households on the HCVP Waiting List.
TBRA for Non-Homeless Special Needs	TBRA is important for non-homeless special needs populations. It is estimated that over 40 percent of persons in the labor force with a disability are unemployed and are below the poverty level in the CNMI. This is an indication that there could be a high demand for TBRA to house the special needs population.
New Unit Production	<ul style="list-style-type: none">• The CNMI continues to administer the LIHTC program to build affordable rental housing for low-income persons.• There are about 202+ families are on the waitlist under the Housing Choice Voucher Program /Section 8, and 500+ families are on the waiting list in the Multifamily Program
Rehabilitation	<ul style="list-style-type: none">• An estimated 60 percent of owner-occupied and 46 percent of renter-occupied households are incurring housing costs that are more than 30 percent of their income.• An estimated half of the vacant units in the CNMI that are up for sale have been identified as suitable for rehabilitation.• An estimated 1,700 of the extremely-low to moderate-income households lack kitchen or plumbing facilities.
Acquisition, including preservation	Approximately 75 percent of vacant homes for sale are priced at \$80,000 and below. HUD's HOME Area Median Purchase Price for the CNMI for new and existing units is \$60,000.

Table 47 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

In PY20, the following financial resources are available for projects to address new activities for PY20, to continue previously approved activities, and to address the Covid pandemic.

1. HUD CPD entitlement allocated funds total \$1,505,032 (\$961,222 for CDBG, \$463,940 for HOME, and \$79,870 for ESG).
2. CDBG PY Year Resources still available due to slow moving activities: \$644,160 (CDBG). If there is slow moving progress within PY 20, NMHC will reprogram the funds to other activities. HOME PY Resources is estimated at \$2M
3. In response to the Covid pandemic, additional formula grant funds are allocated to CNMI through the CARES Act to CDBG and ESG specifically to prepare, prevent, and respond to the public health emergency. A total of \$823,905 in CDBG funds and \$1,096,639 in ESG funds.
4. Program Income (anticipated) CDBG of \$5,060 and HOME of \$235,000 and (prior year) HOME \$1.07M.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-federal	Admin and Planning Public Facilities Economic Development Public Services Public Improvements Acquisition	\$961,222	\$0	\$644,160	\$		For the PY20 Action Plan year, CDBG funds will be used for public facilities and program administration and planning. Prior Year resources are identified as reprogrammed funds from ongoing but slow-moving activities.
ESG	Public-federal	Rapid Rehousing (rental assistance) Homelessness Prevention (rental assistance) Housing Relocation and Stabilization Services Shelter Operations	\$79,870	\$0	\$0	\$79,870		At least 60% of ESG funding will be allocated to rapid re-housing activities, while 40% of ESG funding will be used for homelessness prevention activities (calculated after percentages have been set aside for program administration (7.5%) and HMIS (10%). NMHC will focus on assisting the literally homeless households, since it's a rapidly growing problem in the CNMI.

HOME	Public-federal	Acquisition Homebuyer assistance Homeowner Rehab	\$463,940	\$0	\$2,000,000	\$		PY 2020 HOME funds will be for homeowner rehab. PY resources will be used for homeowner rehab, new construction, and acquisition. PY resources are funds that have not been expended due to slow moving activities
CDBG-DR	Public-Federal	Disaster Recovery	\$26,272,756	\$0	\$0	\$26,272,756		CDBG-DR allocation reflected is the estimated amount of CDBG-DR funding expected to be obligated and expended during FY 2021

Table 48 - Anticipated Resources

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

There is no matching requirement for the HUD-funded programs above for the CNMI.

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

Discussion

Specifically referring to the community development needs that will be addressed through the CDBG program, NMHC has only funded projects on publicly owned land or property, since more than 90% of CDBG projects, since the inception of the grant, has been public facilities. In all cases, before the submission of CDBG proposals, NMHC requests for a land designation from the Department of Public Lands to the proponent of the project. It is most likely that HUD-funded projects are located in the Village Homestead areas (HOME, NSP) and in the Public Facilities and Other areas (CDBG). As with other housing needs, section-8 assisted units are owned by private landlords, LIHTC projects' properties are owned by private companies, and HOME-assisted units are owned by private owners. Please see tables below which provides information on public land use and other land uses (Date extracted from the CNMI Department of Public Lands' Land Use Plan updated in 2019): In addition to the tables below, the Northern Islands is 13, 307, hectares, and 100% of the island is public land.

SAIPAN	Hectares	% of total Land	Public Land (Hectares)	% of Public Land
Total Land Area	11,913			

Private Land	5,822	49%		
Public Land	6,090	51%		
Grant of Public Domain Land			1,604	26%
Designated/ In Use Public Land			1,057	17%
Undesignated/ Not in Use Public Land			2,819	46%
Leased Public Land			558	9%
COVENANT Leased Public Land			52	Less than 1%

TINIAN

Total Land Area	10,177			
Private Land	985	10%		
Public Land	9,179	90%		
Grant of Public Domain Land			649	7%
Designated/ In Use Public Land			517	6%
Undesignated/ Not in Use Public Land			1,163	13%
Leased Public Land			590	6%
Military Leased Public Land			6,260	68%

ROTA	Hectares	% of total Land	Public Land (Hectares)	% of Public Land
Total Land Area	8,693			
Private Land	2,412	28%		
Public Land	6,282	72%		
Grant of Public Domain Land			473	8%
Designated/ In Use Public Land			3,042	48%
Undesignated/ Not in Use Public Land			2,618	42%
Leased Public Land			149	2%

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

See next page

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Office of the Governor and Lt. Governor; Governor Ralph DLG. Torres and Lt. Governor Arnold I. Palacios	CNMI Government (Executive Branch)	Oversees the entire CNMI; Designated recipient of HUD CPD Grants for the CNMI	CNMI- Saipan, Tinian, and Rota
22 nd CNMI Legislature	CNMI Government (Legislative Branch)	Law-making body which creates laws and has the power to amend, enact, and appeal public policy; Approves the 5-year Consolidated Plan and Annual Action Plan through a House Joint Resolution	CNMI- Saipan, Tinian, and Rota
Northern Marianas Housing Corporation	Autonomous CNMI Government Agency	Recipient of HUD grant funds; Comprised of a 7-member Board appointed by the Governor to create policy adherent to HUD regulations (See details below)*	CNMI- Saipan, Tinian, and Rota
Office of the Mayors of Saipan, Tinian, and Rota	CNMI Government	Speaks for the government and the state as a whole; The Mayors of the Saipan, Tinian, and Rota municipalities are involved most especially in community development projects that will benefit each village. Because the Mayors' roles on the islands of Tinian and Rota are much more significant, being that they are the "head of state", the Mayors on both islands also play a significant role in ensuring that the Tinian and Rota residents have access to available resources for low-income housing and mortgage loans.	CNMI- Saipan, Tinian, and Rota
Northern Marianas Protection and Advocacy Services	Non-Profit	Assists NMHC clients with disabilities, particularly in the Section 8 and Mortgage programs	CNMI- Saipan, Tinian, and Rota
Guma Esperansa/ Division of Youth (Shelters)	CNMI Government	Serves as referral agencies particularly for Section 8 and ESG programs; Plays an integral role in the	CNMI- Saipan, Tinian, and Rota

		Consolidated Plan as they provide pertinent statistical client information to assist NMHC in developing goals and objectives for the coming years	
Mental Health Planning Council	CNMI Government	NMHC plays a pertinent role on their Board of Directors as the agency particularly assists clients with mental disabilities to obtain housing	CNMI- Saipan, Tinian, and Rota
Council on Developmental Disabilities	Government	NMHC plays a pertinent role on their Board of Directors as the agency particularly assists clients with developmental disabilities to obtain housing	CNMI- Saipan, Tinian, and Rota
U. S. Delegate's Office	Federal Government	Congressman Gregorio Sablan plays a pertinent role in U. S. Congress in ensuring that federal assistance is maintained for the CNMI, including HUD grants	CNMI- Saipan, Tinian, and Rota

Table 49 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Strengths: Because Single Audits are performed on an annual basis, the findings cited each year allows NMHC, the lead agency, to assess its weaknesses and improve in each program. An apparent strength is that the internal controls currently implemented are effective which is proven in the decrease of audit findings through the years. In 2019, NMHC received a total of (8) findings in , with total questioned costs of \$149,048. NMHC reduced its findings to by 33% from 2014; however questioned costs increased by 55%, due to the findings in eligibility and allowable costs that dated back to more than 10 years go. NMHC continues its efforts in strengthening internal controls. NMHC, as lead agency, has also streamlined its policies and procedures and tightened its monitoring procedures in the various HUD-funded programs and has focused on subrecipient monitoring, quality control assessment of Section 8 files, opening key staff positions, improving its accounting processes in the Fiscal Division, offers technical assistance to Subrecipients in the public hearings, increased involvement in Fair Housing activities, and has been proactive in trainings, most especially certification trainings which would benefit each Division. NMHC has been more proactive in increasing the involvement of Subrecipients in the planning process and in attending technical assistance trainings that are also included in the public hearing agenda for CPD funds. NMHC conducts frequent subrecipient monitoring, since a Planning Assistant position has been opened two years ago. The Special Assistant to Housing's duties of performing quality control of Section 8 files have allowed the Housing Specialists to be aware of all Section 8 requirements, including assuring that all pertinent documents are on file, which has lessened a significant amount of audit findings over the years. NMHC also ensures that staff attend trainings in the various programs, and if applicable, take the opportunity to acquire housing-related certifications. As a result of its efforts

in the past five years, and other strengths mentioned above, NMHC is confident in achieving goals for the next five years.

Gaps: NMHC still lacks certain pertinent information to include in its Plans. The limited data in the American Community Survey and American Fact Finder has precluded the lead agency from inputting statistics into the Consolidated Plan; therefore, estimates are used in certain tables. Local data has been quite difficult to compile due to the disaster that have occurred in the past three years in addition to the CoVid pandemic's impact on the islands. In addition to such factors, agencies such as the Department of Commerce's Central Statistics Division, have been short-staffed, and limited funding has made it difficult to hire state-side consultants. Limited capacity in the agency has also limited the number of updated reports/surveys that could be beneficial to the drafting of the Consolidated Plan. As a result, it may be difficult to convey certain needs to the Grantor, because of the lack of quantitative data to support the need. NMHC also lacks the resources or training to draft an Analysis of Impediments, and therefore, has solicited the services of a stateside vendor. Another gap in the delivery system is the limited number of private/non-profit organizations in the CNMI which makes it difficult to gather sufficient information for certain areas of the Consolidated Plan, specifically the homeless and CoC data. NMHC heavily relies on the public sector to supply information. As a result, the goal of establishing a Continuum of Care in the CNMI has also been difficult due to the limited capacity to operate such a program. The NMHC hopes for Fair Housing and AI education and training and more information resources that would improve our overall performance.

Availability of services targeted to homeless persons and persons with HIV and mainstream services (See table)

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	x	
Legal Assistance	x	x	x
Mortgage Assistance	X	x	
Rental Assistance	X	x	
Utilities Assistance	X	x	
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics	X		x
Other Street Outreach Services	X		

Supportive Services			
Alcohol & Drug Abuse	X	x	
Child Care	X		
Education	x		
Employment and Employment Training	X		
Healthcare	X		
HIV/AIDS	X		x
Life Skills	X		
Mental Health Counseling	X		
Transportation	X		
Other			
Other			

Table 50 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Unlike its neighboring island of Guam, the CNMI lacks a number of agencies that specifically focuses its services for homeless persons. Although there are a number of services (see categories above) provided in the CNMI, only a few are targeted to the homeless population. There are currently no homeless shelters in the CNMI, and as of date, a Continuum of Care program does not exist in the CNMI. This is due to the lack of organizational capacity in order to carry out the program successfully. In 2011, NMHC transitioned from allocating operational funding to the Guma Esperanza Shelter and the Division of Youth Shelter to allocating Emergency Solutions Grant Funds to Karidat Social Services for rapid rehousing and homeless prevention assistance. As of date, there are close to 70 households assisted with ESG funds. Assistance includes rental payments, utility deposits, and utility payments for a period of 10 months. The Karidat Social Services also offers financial assistance through their Emergency Food and Shelter Program, in which the eligible household is given a one-month hotel voucher and food voucher. The program targets homeless families with children and homeless individuals. The Guma Esperanza Shelter offers shelter, food, and counseling services for victims of domestic violence, sexual assault, and human trafficking including their children who have become literally homeless. In FY 2019, Guma Esperanza assisted a total of 151 homeless households due to victimization and the Division of Youth Services assisted a total of 30 youth made homeless due to neglect, abuse, or who have run away from home.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Strengths: NMHC has strengthened its ties and has played a significant role in ensuring consistent communication and constant coordination with key social services providers such as Karidat Social Services, Dept. of Labor, Guma Esperanza Shelter, Division of Youth Services Shelter, Department of Community and Cultural Affairs, Office of Vocational Rehabilitation, etc. The referral of clientele to the appropriate agencies has increased, since various educational trainings on the service provider's key role and purpose have been more consistent over the years. Agencies are more aware of programs being offered, and the NMHC has been proactive in various boards and policy-making bodies as well. For those who have experienced homelessness due to the disasters, NMHC has established a stronger relationship and effective communication with the Community Guidance Center's newly created Disaster Management Services Division, who have played a significant role in client referrals. NMHC has also improved its

outreach efforts, over the years. Aside from newspapers and social media, NMHC has been active in radio forums to discuss its various programs offered.

Gaps: The table proves that homeless assistance is provided in the CNMI; however, the demand for such services is far greater than the funding allocated to specific programs. Because of this, the above agencies have opted to provide short-term financial assistance in order to help a greater number of families. Because the CNMI also lacks the organizational capacity to run a CoC program, comprised of key social services providers, the CNMI loses millions of CoC dollars to other jurisdictions. Currently, the homeless program services provided are for short term financial assistance which makes it difficult for a household to maintain housing stability.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

(Gaps in the delivery system to address the special needs population and homelessness) In the next five years, the CNMI will continue the point in time surveys to gather more accurate data on families and individuals who are literally homeless or at risk of homelessness. NMHC will continue to proactively coordinate with key agencies and non-profit organizations such as Karidat Social Services, Salvation Army, Guma Esperansa Shelter, the Department of Public Health, and the Division of Youth Services Shelter to continue the effort. The survey is an effective tool to demonstrate the need for homeless assistance in the CNMI. The information will be entered into the HMIS where key agency personnel will have access, so there is no duplicate count of households assisted.

SP-45 Goals Summary – 91.215(a)(4)

Table 51 – Goals Summary

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Infrastructure Improvements	2020	2024	Low-and moderate-income populations	CNMI-wide	Community Development	CDBG	1 project a year

2	Job Creation/Retention	2020	2024	Special Needs and Low-and moderate- income populations	CNMI-wide	Non-housing Community Development	CDBG	up to 3 projects within five years
3	Public Services	2020	2024	Special needs populations Low-and moderate-income populations	CNMI-wide	Non-housing Community Development	CDBG	up to 3 projects within five years
4	Sustain Affordable Housing Stock	2020	2024	Special needs populations Low-and moderate-income populations	CNMI-wide	Affordable Housing	HOME	Rehab units: 3 projects a year
5		2021	2024	Special Needs and Low-mod income populations	CNMI-wide	Affordable Housing/Homeless		New construction: Up to 2 projects a year; Acquisition: 1 project a year
6	Emergency Shelter/Transitional Housing	2020	2024	Special Needs and Low-mod income populations	CNMI-wide	Homelessness and Affordable Housing	CDBG/ESG	Two projects within five years
7	Public facilities and Improvements	2020	2024	Special Needs and Low-mod income populations	CNMI-wide	Non-housing Community Development	CDBG	Up to 3 projects a year
8	Promote Fair Housing	2020	2024	Special Needs and Low-mod income populations	CNMI-wide	Non-housing Community Development	CDBG/HOME/ESG	One fair housing workshop per year
9	Community Enhancement	2020	2024	Special Needs and Low-mod income populations	CNMI-wide	Non-housing Community Development	CDBG	Up to 3 projects a year
10	Provide services to the homeless population	2020	2024	Special Needs and Low-mod income populations	CNMI Wide	Homelessness	ESG	6 households a year
11	Disaster Recovery	2020	2024	Special Needs and Low-mod income populations	CNMI-wide	Affordable Housing Homelessness Non-housing Community Development	CDBG-DR	By Year 2 of the ConPlan 1 unit rehab and reconstruction; 8 new housing added; 13 new rental housing added; 10 rental

								and rehabilitated units; 7 units homeownership assistance; 7 units residential rehab and construction; 2 public facilities
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Goal Descriptions

1	Goal Name	Infrastructure improvements
	Goal Description	<ul style="list-style-type: none"> • Construct infrastructure to support housing • Improve infrastructure to support housing • To improve infrastructure to strengthened resilience to mitigate potential disaster damage
2	Goal Name	Job creation/retention
	Goal Description	<ul style="list-style-type: none"> • Promote employment opportunities for persons with disabilities • Support micro-businesses with loans or grants
3	Goal Name	Public Services
	Goal Description	<ul style="list-style-type: none"> • To support projects particularly related to healthcare, recreational programs, service for senior citizens, substance abuse programs, and fire and emergency medical services
4	Goal Name	Sustain Affordable Housing Stock
	Goal Description	<ul style="list-style-type: none"> • Support any HUD financing program that expands the stock of affordable housing in the CNMI. • Assist very low and low income first time home-owners to construct or acquire a safe, affordable home
5	Goal Name	Expand Affordable Housing Stock
	Goal Description	<ul style="list-style-type: none"> • Support any HUD financing program that sustains the stock of affordable housing in the CNMI.

		<ul style="list-style-type: none"> • Assist very low and low income homebuyers to sustain the physical and economic life to their homes, to meet current building code standards, and/or to modify to meet ADA standard
6	Goal Name	Emergency Shelter/Transitional Housing
	Goal Description	<ul style="list-style-type: none"> • Support financing of transitional housing to provide temporary housing for homeless individuals, including those who are transitioning from drug rehabilitation centers and prison • Support financing the construction of an emergency shelter to provide temporary housing for those who are seeking shelter from a disaster or who find themselves temporary homeless
7	Goal Name	Public Facilities and Improvements
	Goal Description	<ul style="list-style-type: none"> • To acquire, construct, or rehabilitate facilities for low-moderate income communities and special needs populations <ul style="list-style-type: none"> ○ Sports and Recreational Facilities ○ Community Centers ○ Facilities that improve services to the general public ○ Youth Centers ○ Community Centers
8	Goal Name	Promote Fair Housing
	Goal Description	<ul style="list-style-type: none"> • Identify and address barriers to fair housing
9	Goal Name	Community Enhancement
	Goal Description	<ul style="list-style-type: none"> • Operational support of facilities providing services to special needs population • Support the work of organizations that aim to reduce homelessness
10	Goal Name	Provide services to the homeless population
	Goal Description	<ul style="list-style-type: none"> • Provide Operations Support for programs serving homeless persons, disabled persons, and those with special needs. • Support programs addressing poverty for income-eligible individuals, specifically those who are homeless or at-risk of homelessness
11	Goal Name	Disaster Recovery
		<ul style="list-style-type: none"> • To allocate CDBG-DR funding to Housing, Infrastructure and Economic Development to ensure added resiliency in future, potential disasters

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

ESG funds will be used to provide rapid rehousing assistance to an estimated 6 households. ESG funds will be used to assist and estimated 6 households to avoid eviction and homeless prevention assistance to households with extremely-

low incomes (at or below 30% of Area Median Income) . HOME funds in PY20 are expected to assist up to 3 eligible households to rehabilitate their homes. HOME eligibility will be based on the households meeting the income threshold of 80% AMI. The CNMI also seeks to contribute CDBG-DR funds to resolve the overall shortage of housing for households at or below the HUD limit of 80% AMI.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)**Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

As a recipient of HUD funding, NMHC is in compliance with Section 504, the Fair Housing Act, and the American with Disabilities Act. NMHC ensures that individuals with disabilities are afforded reasonable accommodations and requires compliance with these regulations for all New Construction Projects so as to continue assisting individuals and families.

Activities to Increase Resident Involvements

Currently, there is no Resident Advisory Board (RAB) under NMHC's Section 8 Housing Assistance Payment Program – New Construction. Despite this, NMHC staff under the Asset Management Division and Field Offices continue to conduct outreach efforts to residents/tenants under the Section 8 Housing Assistance Payment Program – New Construction – so as to inquire about, encourage, and promote resident/tenant participation. NMHC is looking at options to assess, expand, and improve its current outreach efforts so as to promote resident/tenant participation.

Is the public housing agency designated as troubled under 24 CFR part 902?

The Northern Marianas Housing Corporation (NMHC) is the Public Housing Agency (PHA) in the CNMI. NMHC is not designated as "troubled" by HUD under 24 CFR Part 902.

Plan to remove the 'troubled' designation

Not applicable.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Minimum Wage & Employment

The CNMI's current minimum wage is \$7.25 per hour. The current minimum wage does not allow room for families build or acquire an affordable home. The high cost of utilities, food, fuel, and other commodities are preventing families from affordable housing. Many households that cannot afford to obtain a decent home choose to live in substandard homes that do not have the proper sanitary facilities and adequate number of rooms to accommodate their household size. Developers attributed this increase to several factors including the rising cost of labor, materials, land, and utilities.

Construction Costs

A significant barrier to producing more affordable housing is the rising cost of development and the limited foreign labor capacity in the CNMI. The CNMI being geographically located in typhoon alley calls for stringent building codes to withstand severe weather, with winds of close to 200 MPH as demonstrated by Super Typhoon Yutu. According to NMHC's Asset Management Division, the average cost of construction is \$191,952 (CMU block concrete foundation), which has nearly tripled from 2015. Labor costs have directly impacted the cost of construction: The provisions of US Public Law 110-229 which phases out the CNMI's non-resident labor pool, commonly referred to as a "Commonwealth Worker" or "CW", have created an unprecedented labor quandary which has negatively impacted the CNMI's private sector. Coupled with this mandated reduction of foreign sourced labor is a significantly small populous resulting from out migration prompted by the jurisdiction's previous economic downturn. According to the 2010 CNMI Census, the CNMI's population declined nearly 22% from the previous decade, further shrinking the available labor pool required to support a recovering economy. According to the Government Accountability Office's (GAO) report, the elimination of the CNMI's non-resident labor pool would result in maximum 62% decrease in Gross Domestic Product (GDP). Given the current and projected demand for labor, the size the CNMI's domestic workforce and the uncertainties of continued extensions of the CW program, it is critical for the CNMI to properly plan and strategize its economic course. The CNMI, through it's US Delegate to Washington DC, the construction industry in the CNMI, and businesses continue to advocate for restoration of H2-B Visa Waivers for construction workers and to increase the cap on the number of contract workers (particularly in the construction industry) from the Phillippines and China.

Challenges faced by Persons with Disabilities

NMHC in collaboration with the Northern Marianas Protection and Advocacy System, Inc. (NMPASI) and Council for on Developmental Disabilities (CDD) identified the challenges encountered by individuals with disabilities. People with disabilities are suggesting that the program be brought to them. The following challenges were noted by their case manager at NMPASI: income criteria should be adjusted to reflect the current cost of living in the CNMI, timeframe to be given for people who are on the program, increased utility allowance to reflect the high cost of utilities in the CNMI, and provide home service to individuals with disabilities. The Council on Developmental Disabilities has identified the following barriers that persons with disabilities are faced with: application documents are not accessible for visually impaired, need to provide transitional homes and expand rental housing for those who are homeless, in addition to the waiting list (for Section 8 programs) being too long, and the need to enforce Fair Housing Act of 1998. The CNMI will address other impediments though its continued partnership with NMPSI, Council on Developmental Disabilities, CNMI Office of Vocational Rehabilitation, Commonwealth Office Transit Authority, etc. The CNMI will strengthen its fair housing education efforts by providing additional training to NMHC's Fair Housing Officer and increase the number of fair housing workshops, targeted to persons with special needs.

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SP-60 Homelessness Strategy – 91.215(d)

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

The CNMI currently does not have a Continuum of Care Program in place nor has it conducted point in time survey due to the lack of funding and organizational capacity. The Northern Marianas Housing Corporation and Karidat Social Services are the only two agencies on island that administer programs which provide temporary housing assistance to homeless persons. The Salvation Army Chapter of the CNMI provides a soup kitchen for families who are in need of food and do not operate on a daily basis. The NMHC, through the HPRP Program, made possible through the ARRA Grant, from 2009-2012, provided temporary housing assistance for a period of 6 months. Each household needs were assessed by the Subgrantee case workers. The Subgrantee, at that time, was the Northern Marianas Protection and Advocacy Systems, Inc. NMHC currently administers the Emergency Solutions Grant Program which provides 10 months rental/utilities' assistance to literally homeless and at risk of homelessness households. Through the ESG Program, NMHC is able to assist an average of 6 households on an annual basis. The ESG is subgranted to Karidat Social Services, who also perform assessment on individual households' needs before admission into the program. Karidat Social Service also provides 1 month hotel and food vouchers to homeless or at risk of homelessness households made possible through a grant through the Department of Health and Human Services.

Addressing the emergency and transitional housing needs of homeless persons

The CNMI does not have transitional housing. Temporary housing is provided through the Emergency Solutions Grant Program, funded through HUD and administered at NMHC and through the Emergency Food (and Shelter) Program, administered by Karidat Social Services and funded through the United Way. The Section 8 and Multifamily Programs also address the needs of persons who may be homeless. The only (2) emergency shelters on island are the Guma Esperansa Shelter which serves victims (women and children) who find themselves homeless due to domestic violence and the Division of Youth Shelter which serves youth and children who are victims of child abuse, neglect, and runaway youth.

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

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

- 1) Continue to allocate ESG funding to support the non-profit organization(s) who will be conducting case management for literally homeless and at risk of homelessness households—To assist at least (6) households each year (rapid re-housing and homelessness prevention assistance).
- 2) Support the work of non-profit organizations and the public sector providing assistance to very low and low-income individuals, and special needs populations.
- 3) As the statistics have been gathered for the number of people living with AIDS in the CNMI, and although the number is rather small, the NMHC will identify funding to support this special needs population (particularly for housing assistance)
- 4) Continue to support the revitalization of programs implemented by the Transitional Living Center who offer services to those who are likely to become homeless after being discharged from a publicly funded institution (prison, mental institution, etc.) and the Independent Living Center who offer life skill training to a special needs population
- 5) Continue to support the two existing shelters (whether through CDBG or ESG) in the CNMI—the Guma Esperansa Shelter (serve domestic violence victims who are considered homeless), and the Division of

- Youth Shelter Services Shelter (serve youth who are victims of child abuse and neglect/runaway youth).
- 6) Within the next five years, conduct a point in time survey to gather more accurate information on homeless households in the CNMI¹, and once the data is gathered, apply for a Continuum of Care Program grant in order to meet the homeless needs in the CNMI (Target date: Year 1 of the Consolidated Plan).
 - 7) Acquire, construct, rehabilitate or convert structures for use as housing for special needs and homeless populations.
 - 8) Acquire, construct, rehabilitate or convert structures used as public facility to provide services for special needs and homeless populations (i.e. soup kitchens, outreach facilities, etc.)

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The CNMI continues to ensure compliance with Federal and Local statutes concerning lead based paint. CNMI's contractors are required to comply with 40 CFR Part 745. The federal law requires contractors performing renovation, repair and painting projects that disturb lead-based paint in homes, child care facilities and schools built before 1978 to be certified and to follow specific work practices to prevent lead contamination. The CNMI continues to address the dangers of lead-based paint in existing and future housing by facilitating the availability of information to homeowners and homebuyers of all income levels. The CNMI ensures that procedures are implemented to provide information to families and individuals on the dangers of lead-based paint before they commence the search for rental housing. New HCVP tenants attend an initial briefing as part of their entrance into the program. Participants are instructed on the hazards of lead-based paint and provided HUD-approved materials on the subject. HCVP building inspectors conduct lead-based paint inspections to ensure safety compliance prior to permitting occupancy for any individual or family participating in the program. In the case where there is possible lead contamination (for a facility funded by CDBG), NMHC covers the cost for a certified lead inspector to assess the facility and perform the necessary mitigation measures to enable the use of the facility.

How are the actions listed above related to the extent of lead poisoning and hazards?

The CNMI estimates about 1,189 families (495 families in owner-occupied units; 694 families in renter-occupied units) that may have lead-based paint hazards. This number is based on the occupied units constructed before 1980. There may be a possibility that more than one family are in the occupied units. For the purpose of this Plan, NMHC will assume one family per unit. Whether the households have children under 18 years old cannot be determined, as the US Census 2010 for the CNMI does not provide such data.

How are the actions listed above integrated into housing policies and procedures?

For homes completed before January 1978, they must be checked for lead in one of two ways or both:

- 1) A paint inspection which shows the lead content of every different type of painted surface in the home.*
- 2) A risk assessment which shows if there any sources of serious lead exposure (such as peeling paint or lead dust). A risk assessment provides the homeowner the necessary actions to take when addressing these hazards.*

Only a trained, certified professional is allowed to check the home for such hazards, and only a certified lead abatement contractor is allowed to permanently remove lead hazards. However, if the risk assessment does not reveal any lead based paint hazards, NMHC will not require the homeowner to conduct any abatement of lead hazard. For the homes completed before January 1, 1978, the following forms must be completed:

- Lead hazard evaluation notice*
- Notice of lead hazard reduction*
- Relocation screening sheet for projects with lead hazard reduction activities*
- Protection of occupants' belongings and worksite preparation for lead hazard reduction activities*
- Property owner/rehab contractor contract addendum reduction of lead-based paint hazards*

The following are required activities to address lead-based paint:

- 1) Notification: Lead Hazard Information Pamphlet- occupants, owners, and purchasers must receive the EPA/HUD/Consumer Project Safety Commission lead-hazard information pamphlet, or an EPA-approved*

equivalent; Disclosure- property owners must provide purchasers and lessees with available information or knowledge regarding the presence of lead-based paint and lead-based paint hazards prior to selling or leasing a residence; Notice of Lead Hazard Evaluation or Presumption- occupants, owners, and purchasers must be notified of the results of any lead hazard evaluation work or the presumption of lead-based paint or lead hazards.

2) Notice of Lead Hazard Reduction Activity- Occupants, owners, and purchasers must be notified of results of any lead-hazard reduction work.

3) Lead Hazard Reduction- Reduction methods described include paint stabilization, interim controls, standard treatments, and abatement.

LBP hazards are also integrated into the Section 8 and ESG Policies and Procedures. The CNMI ensures that participants in the Housing Choice Voucher program and the Emergency Solutions Grant Program (rapid re-housing and homeless prevention activities) are educated on the hazards of lead-based paint in rental housing, as part of the intake process. They are provided with brochures and will have to acknowledge the receipt of the “Watch Out for Lead Based Paint Poisoning” material. They are also advised of the hazards of lead-based paint during orientations when new vouchers are issued. Also, at initial inspection of the rental housing unit (in both programs), a certified NMHC inspector must complete HUD Form 52580, an Inspection Checklist, to ensure that there is no potential lead hazard. If a hazard is identified, the problem must be mitigated by the landlord. To date, lead-based hazards have been identified in any HUD-assisted unit. As with the ESG Program, the Subgrantee fills in a Lead Based Screening Worksheet and at inspection of the unit, ensures that there are no lead-based paint hazards based on the Habitability Standards Checklist.

Approved Section 8 Landlord units currently does not have a unit constructed before 1978. In the rare case which a landlord registers such a unit and tenant prefers the unit constructed before 1978, the above actions will be taken and a certified environmental agency would have to conduct lead-abatement procedures. As with the ESG program, the Subgrantee encourages the tenant to select a unit constructed after 1978, in order to prevent additional mitigation steps, which would require additional funding. The ESG program is very limited in funding, as opposed to other CPD programs. To date, no rental unit in the ESG program was constructed before 1978.

As with the HOME Program, the policy (in italicized above) is integrated in the HOME Rehabilitation Policy.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

According to the 2010 U. S. Census, in the CNMI, there were a total of 4,760 who were living below the poverty level. There are various government and private sector entities who offer a wide array of services to meet the basic needs of families living below poverty level. In the next five years, the CNMI will continue to collaborate with the Dept. of Labor- Workforce Investment Agency Program, the Community Development Institute at the Northern Marianas College, and the Northern Marianas Trades Institute to offer education and employment training for families, and also with the Independent Living Center who offer life skills training. Most importantly, to attain the goal of eliminating or reducing poverty in the CNMI, a Family Self-Sufficiency Program was created at the NMHC in November 2014, to enroll families who are in the Section 8 program (most with zero income) to achieve financial and housing stability, so they are able transition out of the program into their own housing. A household must first achieve self-sufficiency in order to gain independence. Since its inception, NMHC has enrolled a total of (31) families who are now active participants. NMHC created a committee of FSS members from various agencies including the Department of Labor, Northern Marianas College, Northern Marianas Protection and Advocacy Services, Office of Vocational Rehabilitation, and the Department of Community and Cultural Affairs. In addition, the NMHC will collaborate with the Department of Community and Cultural Affairs, an agency which established the Leadership Economic Opportunity for Self-Sufficiency program which conducts training on (3) levels:

- 1) On-the-Job Training consists of shadowing DYS staff in the daily activities in the 3 units of the division.
- 2) With the DYS partnering agencies such as the Workforce Investment and Department of Labor, and HR Support Agency; they are trained i.e., administrative assistant certification training, warehouse worker training (with a certification on forklift operation – 5 ton)
- 3) And for those who lack a high school diploma—they will be enrolled in the GED program

Moreover, as a result of Super Typhoon Yutu, and the allocation of nearly half a billion dollars allocated to the CNMI for Disaster Recovery, it would be an opportunity for the CNMI to employ individuals who live below the poverty level. NMHC has also established relationships with a multitude of agencies and is also a part of the Board on the Mental Health Planning Council and Developmental Disabilities Council. NMHC has also worked closely with the Karidat Social Services, through the Emergency Solutions Grant Program, not only to offer financial assistance but also budget counseling and guidance towards all the necessary resources to enable homeless (most likely below the poverty level) households to achieve economic stability after their assistance has ended. The CNMI's leadership has focused on economic opportunities for CNMI residents through significant developments that are forthcoming. The CNMI's support of increasing minimum wage an additional \$0.50 (\$7.25/hr. in September 2018), although small, will have a large impact on CNMI households who are receiving minimum wage and most of them are unable to meet basic needs. This, along with NMHC's antipoverty strategy, will enable families to obtain new jobs, which will reduce and eliminate poverty in the CNMI. As you will see through the Program and Housing Division goals and Mortgage and Credit goals, NMHC's ultimate goal is to transition a family out of poverty and out of substandard housing into a safe, sanitary, and decent home.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

The NMHC will continue to implement the Family Self-Sufficiency Program and will to aim to transition the (31) Section 8 assisted families currently enrolled in the program within the next five years and work towards enrolling more families in the program. In addition, NMHC will support the work of the CNMI's Department of Community and Cultural Affairs Family and Youth Enhancement Program which provides preventative and supportive activities that would assist youths and families in developing sustainable basic skills, thus eliminating at-risk behaviors and provide opportunities for more positive lifestyle, enhancing their capacity to make healthier life choices and achieve self-sufficiency.

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SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements.

Once the projects have been selected by the 8-member evaluation committee, the Planning Division (comprised of the Deputy Corporate Director/Planner and Planning Assistant) will continue to work closely with the Subrecipients and provide technical assistance in a variety of the program areas. NMHC ensures compliance with all local and federal procurement regulations. For projects that will be bid out by the Subrecipients, the NMHC Procurement Officer will monitor for proper bidding in accordance with HUD Procurement regulations and that the selected contractor submit all required documentation. Upon selection of the project, the activity is set up in IDIS, and the monitoring process begins. The monitoring process will involve recurrent communication in person, telephone, emails, on-site visits, and regularly scheduled meetings with the Subrecipients. Consistent monitoring through these channels of communication will alleviate any delays to the project's completion time, avoid any set-backs, and ensure compliance with all program requirements. Moreover, the Planning Division with the Fiscal Division, will continue to monitor funding through the IDIS System and a separate monitoring system (Excel spreadsheets) that will be maintained by both Divisions. Such procedure will ensure that all payment requests and progress billings submitted by a contractor are accurate and that there is sufficient funding for each activity. For the Environmental Assessments that are required of each project, if the Subrecipient does not have the capacity to complete an EA, the Planning Division will usually assist the Subrecipient in preparing the EA. In the case that the Subrecipient has the capacity to prepare an EA, NMHC will continuously monitor the Subrecipients' progress of work to avoid delays in a project's completion time. The Planning Division will coordinate with the Subrecipients and various environmental regulatory agencies to determine the type of impact the project will have on the environment. The Planning Division will continue to follow-up with the aforementioned agencies on a regular basis to ensure all HUD Environmental standards are met and that the projects proceed in a timely manner. As part of the monitoring process, for the selected projects, the NMHC will establish Subrecipient Agreements, providing documentation that Federal requirements are being met, ensure proper use of CDBG funds, and promote timely expenditures of CDBG funds. For ongoing projects, the Planner/Grant Writer will ensure that the Subrecipients continue to comply with all sections of the Subrecipient Agreement. During the construction of a project, frequent physical inspections will be performed by the Asset Manager, who also monitors HOME and NSP projects. He will address technical flaws (if any) with the contractor. The Asset Manager will also ensure that the contractor is complying with HUD Labor Standards by conducting employee interviews and collecting payroll schedules. The Asset Manager documents each inspection visit and will forward the report to the Planning Division. When NMHC is at a timeliness risk, the Planning Division will request milestone/drawdown schedules from the contractor. These schedules will enable the CDBG staff to be fully aware of the construction activities for each project and the estimated monthly drawdowns that will occur. Upon acceptance of a project by NMHC and the turn-over of a project to a Subrecipient, NMHC will continue to monitor compliance with all program requirements by conducting random on-site visits and address set-backs (if any) by communicating with the Subrecipient until all issues have been resolved.

Expected Resources

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

Introduction

The CNMI has received a total of \$1,505,032 in CPD funds for the first year of the ConPlan PY2020. This Action Plan year, the CNMI received \$961,222, in CDBG funds, \$469,940 in HOME funds, and \$79,870 in ESG funds. In the next program year, the CNMI prioritizes on planning and administrative activities, economic development activities, public facilities, and recreational facilities. HOME funds will be utilized for homeowner rehabilitation, while PY residual funds will be used for new construction and acquisition. And ESG funds will focus on the continuation of providing homeless prevention and rapid re-housing, housing relocation and stabilization services, and

administration.

In response to the Covid pandemic, additional formula grant funds are allocated to CNMI through the CARES Act to CDBG and ESG specifically to prepare, prevent, and respond to the public health emergency. A total of \$823,905 in CDBG funds and \$1,096,639 in ESG funds.

Program Income (anticipated) CDBG of \$5,060 and HOME of \$235,000 and (prior year) HOME \$1.07M.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-federal	Admin and Planning Public Facilities Economic Development Public Services Public Improvements Acquisition	\$961,222	\$0	\$644,160	\$		For the PY20 Action Plan year, CDBG funds will be used for public facilities and program administration and planning. Prior Year resources are identified as reprogrammed funds from ongoing but slow-moving activities.
ESG	Public-federal	Rapid Rehousing (rental assistance) Homelessness Prevention (rental assistance) Housing Relocation and Stabilization Services Shelter Operations	\$79,870	\$0	\$0	\$79,870		At least 60% of ESG funding will be allocated to rapid rehousing activities, while 40% of ESG funding will be used for homelessness prevention activities (calculated after percentages have been set aside for program administration (7.5%) and HMIS (10%). NMHC will focus on assisting the literally homeless households, since it's a rapidly growing problem in the CNMI.
HOME	Public-federal	Acquisition Homebuyer assistance Homeowner Rehab	\$463,940	\$0	\$2,000,000	\$		PY 2020 HOME funds will be for homeowner rehab. PY resources will be used for homeowner rehab, new construction, and acquisition. PY resources are funds that have not been expended due to slow moving activities
CDBG-DR								

Table 52 - Expected Resources – Priority Table

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

There is no matching requirement for the HUD-funded programs above for the CNMI.

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

Discussion

Specifically referring to the community development needs that will be addressed through the CDBG program, NMHC has only funded projects on publicly owned land or property, since more than 90% of CDBG projects, since the inception of the grant, has been public facilities. In all cases, before the submission of CDBG proposals, NMHC requests for a land designation from the Department of Public Lands to the proponent of the project. It is most likely that HUD-funded projects are located in the Village Homestead areas (HOME) and in the Public Facilities and Other areas (CDBG). As with other housing needs, section-8 assisted units are owned by private landlords, LIHTC projects' properties are owned by private companies, and HOME-assisted units are owned by private owners. Please see tables below which provides information on public land use and other land uses (Date extracted from the CNMI Department of Public Lands' Land Use Plan updated in 2019): In addition to the tables below, the Northern Islands is 13, 307, hectares, and 100% of the island is public land.

SAIPAN	Hectares	% of total Land	Public Land (Hectares)	% of Public Land
Total Land Area	11,913			
Private Land	5,822	49%		
Public Land	6,090	51%		
Grant of Public Domain Land			1,604	26%
Designated/ In Use Public Land			1,057	17%
Undesignated/ Not in Use Public Land			2,819	46%
Leased Public Land			558	9%
COVENANT Leased Public Land			52	Less than 1%

TINIAN	Hectares	% of total Land	Public Land (Hectares)	% of Public Land
Total Land Area	10,177			
Private Land	985	10%		
Public Land	9,179	90%		
Grant of Public Domain Land			649	7%
Designated/ In Use Public Land			517	6%
Undesignated/ Not in Use Public Land			1,163	13%
Leased Public Land			590	6%
Military Leased Public Land			6,260	68%

ROTA	Hectares	% of total Land	Public Land (Hectares)	% of Public Land
Total Land Area	8,693			
Private Land	2,412	28%		
Public Land	6,282	72%		
Grant of Public Domain Land			473	8%

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Designated/ In Use Public Land	3,042	48%
Undesignated/ Not in Use Public Land	2,618	42%
Leased Public Land	149	2%

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

See next page

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Infrastructure Improvements	2021	2024	Low-mod income populations	CNMI-wide	Non-housing community development	CDBG	To fund 1 infrastructure improvement project a year
2	Job creation/retention	2021	2024	Special needs and low-mod income population	CNMI-wide	Non-housing community development	CDBG	To allocate CDBG funding to up to 3 projects within five years
3	Public services	2021	2024	Special needs and low-mod income populations	CNMI-wide	Non-housing community development	CDBG	To allocate CDBG funding to up to 3 projects within five years
4	Sustain Affordable Housing Stock	2020	2024	Special needs populations Low-and moderate-income populations	CNMI-wide	Affordable Housing	HOME	To allocate HOME funding to 3 projects (rehabilitated units) a year
5	Expand housing stock	2021	2024	Special needs populations Low-and moderate-income populations	CNMI-wide	Affordable Housing	HOME	To allocate HOME funding to 3 projects a year. 2 new construction; 1 acquisition
6	Emergency Shelter/Transitional Housing	2022	2024	Special needs populations Low-and moderate-income populations	CNMI-wide	Affordable Housing/Homelessness	CDBG	To allocated CDBG funding to the construction to up to 2 projects starting in PY 2022 to PY 2024

7	Public Facilities and Improvements	2020	2024	Special needs populations Low-and moderate-income populations	CNMI-wide	Non-housing Community Development	CDBG	To allocate funding to 2 projects a year
8	Promote Fair Housing	2020	2019	Special needs populations Low-and moderate-income populations	CNMI-wide	Non-housing Community Development	CDBG/ HOME/ ESG	To conduct 1 fair housing working a year
9	Community Enhancement	2020	2024	Special needs populations Low-and moderate-income populations	CNMI-wide	Non-housing Community Development	CDBG	To allocate CDBG funding to up to 2 projects a year
10	Provide Services to the Homeless	2020	2024	Special needs populations Low-and moderate-income populations	CNMI-wide	Homelessness	ESG	To assist an estimated 6 families per year who are homeless or at-risk of homelessness

11	Disaster Recovery	2020	2024	Special needs populati ons Low-and modera te- income populati ons	CNMI-wide	Affordable Housing, Homelessness, Non-Housing Community Development		By Year 2 of the ConPlan 1 unit rehab and reconstruction; 8 new housing added; 13 new rental housing added; 10 rental and rehabilitated units; 7 units homeownership assistance; 7 units residential rehab and construction; 2 public facilities
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Table 53 – Goals Summary

Goal Descriptions

1	Goal Name	Infrastructure improvements
	Goal Description	<ul style="list-style-type: none"> • Construct infrastructure to support housing • Improve infrastructure to support housing • To improve infrastructure to strengthened resilience to mitigate potential disaster damage
2	Goal Name	Job creation/retention
	Goal Description	<ul style="list-style-type: none"> • Promote employment opportunities for persons with disabilities • Support micro-businesses with loans or grants
3	Goal Name	Public Services
	Goal Description	<ul style="list-style-type: none"> • To support projects particularly related to healthcare, recreational programs, service for senior citizens, substance abuse programs, and fire and emergency medical services
4	Goal Name	Sustain Affordable Housing Stock
	Goal Description	<ul style="list-style-type: none"> • Support any HUD financing program that expands the stock of affordable housing in the CNMI. • Assist very low and low income first time home-owners to construct or acquire a safe, affordable home

5	Goal Name	Expand Affordable Housing Stock
	Goal Description	<ul style="list-style-type: none"> • Support any HUD financing program that sustains the stock of affordable housing in the CNMI. • Assist very low and low income homebuyers to sustain the physical and economic life to their homes, to meet current building code standards, and/or to modify to meet ADA standard
6	Goal Name	Emergency Shelter/Transitional Housing
	Goal Description	<ul style="list-style-type: none"> • Support financing of transitional housing to provide temporary housing for homeless individuals, including those who are transitioning from drug rehabilitation centers and prison • Support financing the construction of an emergency shelter to provide temporary housing for those who are seeking shelter from a disaster or who find themselves temporary homeless
7	Goal Name	Public Facilities and Improvements
	Goal Description	<ul style="list-style-type: none"> • To acquire, construct, or rehabilitate facilities for low-moderate income communities and special needs populations <ul style="list-style-type: none"> ○ Sports and Recreational Facilities ○ Community Centers ○ Facilities that improve services to the general public ○ Youth Centers ○ Community Centers
8	Goal Name	Promote Fair Housing
	Goal Description	<ul style="list-style-type: none"> • Identify and address barriers to fair housing
9	Goal Name	Community Enhancement
	Goal Description	<ul style="list-style-type: none"> • Operational support of facilities providing services to special needs population • Support the work of organizations that aim to reduce homelessness
10	Goal Name	Expand Services to the Homeless

	Goal Description	<ul style="list-style-type: none"> • Provide Operations Support for programs serving homeless persons, disabled persons, and those with special needs. • Support programs addressing poverty for income-eligible individuals, specifically those who are homeless or at-risk of homelessness
11	Goal Name	
	Goal Description	

Projects

AP-35 Projects – 91.220(d)

Introduction

In the table below, you will find the selected projects for Program Year 2020, based on an evaluation conducted by the Planner, Planning Assistance, and Office Manager/Procurement Officer in March 2021. Based on a set criteria (CDBG Program), the projects were scored, in order of priority (20% is automatically set-aside for planning and administrative costs): In addition to the CDBG Program, information on the HOME Program and ESG Program activities are listed below.

Projects

#	Project Name
1	PY 2020 CDBG Planning and Administrative Costs
2	Tinian Children's Park Improvement Project
3	Purchase of Two Wildland Trucks for the CNMI Department of Fire and Emergency Medical Services (DFEMS)
4	Purchase of Personal, Protective Equipment for the CNMI Department of Fire and Emergency Medical Services (DFEMS)
5	PY 2020 HOME Planning and Administrative Costs
6	HOME Investment Partnership (Homeowner Rehabilitation)
7	HESG20 Northern Marianas Housing Corporation
8	Commonwealth Office of Transit Authority Bus Shelters (Alternate Project 1)
9	Kagman Community Park Phase II (Alternate Project 2)

Table 54 – Project Information

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

Reason for allocation priorities:

The CNMI does not allocate investments based solely on geographical location. The greatest, beneficial impact is considered when evaluating project proposals. Since the CNMI's population is smaller than most island territories, projects will impact the CNMI community entirely. Although projects are situated in specific villages, residents from other areas of the island will utilize the project as well. Due to the islands' land mass (Saipan, Tinian, and Rota), each municipality's residents are in close proximity to recreational facilities, public services, and public facilities, in general. It is understood that the low-moderate percentage of the project beneficiaries should be more than 51%. A needs' assessment is also conducted during the project evaluation process. Activities are targeted for geographic service areas where the need is greatest and where the maximum impact will be. In addition, CDBG-DR's allocation priorities are for Housing, Infrastructure and Economic Development. The total amount of funds available for the Northern Mariana Islands is \$243,946,000 of which \$195,157,000 (80 percent) must be utilized in the HUD Most Impacted Areas of Saipan and Tinian. Overall, a minimum of 70 percent of the CDBG-DR funds excluding administrative dollars must benefit the low- and moderate-income populations on the island. Please see CDBG-DR's allocation priorities below:

PROGRAMS	TOTAL ALLOCATION	PERCENT OF TOTAL ALLOCATION BY PROGRAM	PERCENT OF TOTAL ALLOCATION BY PROJECT TYPE
HOUSING (includes delivery costs)	\$113,362,000		

Homeowner Rehabilitation & Reconstruction	\$36,120,667	32%	46%
Single Family New Construction Development	\$41,120,667	36%	
Affordable Rental Housing Development	\$36,120,667	32%	
SUB TOTAL HOUSING	\$113,362,000	100%	
INFRASTRUCTURE	\$105,881,835		
Port Facilities	\$4,000,000	4%	43%
Public Facilities	\$56,881,508	54%	
Roads	\$8,650,000	8%	
Utilities	\$36,350,327	34%	
SUB TOTAL INFRASTRUCTURE	\$105,881,835	100%	
ECONOMIC DEVELOPMENT	\$8,660,000	100%	4%
ADMINISTRATION	\$12,098,818	100%	5%
PLANNING	\$3,943,347	100%	2%
TOTAL ALLOCATIONS OF FUNDS	\$243,946,000	100%	100%

The CNMI's CDBG-DR Action Plan can be found on www.cnmi-cdbgdr.com

Obstacles to meeting underserved needs:

Funding. The financial need of organizations to carry out programs and develop the structure necessary to provide needed services has been an ongoing struggle for the CNMI. To effectively run a program requires secured financial resources that will allow NMHC to

implement both rapid re-housing and long-term housing assistance to eligible households (ESG), so they are given ample time to become self-sufficient and transition out of the housing programs. Limited funding also impedes the distribution of Section 8 HVCP and Multifamily Program vouchers to about 635 families on the program's waiting list. As with community development projects, limited funding each year impedes the timely execution of projects/activities that meets community needs.

Organizational Capacity. Both government and non-government organizations struggle to meet the needs of the underserved and bridge service gaps in the system. The CNMI must continue to support skills training on both the organizational and individual level. The CNMI must also encourage the coordination between government and non-government organizations by providing opportunities for organizations to establish a link. Often times, there is a lack of cohesion between certain agencies which precludes the CNMI from providing the services from the most appropriate agency to meet client needs.

AP-38 Project Summary

Project Summary Information

1	Project Name	PY 2020 CDBG Planning and Administrative Costs
	Target Area	Saipan, Tinian, Rota
	Goals Supported	Public facilities, Infrastructure Improvements, Community Enhancement, Emergency Shelter/Transitional Housing, Promote Fair Housing, Public Services
	Needs Addressed	Non-Housing Community Development
	Funding	\$192,244.40
	Description	The figure in the goal outcome indicator represents the total number of residents on all three islands that will benefit from the CDBG program. The NMHC will use planning and admin funds to develop community planning and development activities that will benefit Saipan, Tinian, and Rota residents, with a total population of 52,890, of which about 85% are low-mod income. In the Annual Goals supported, all goals related to the CDBG and HOME program was checked, as administrative costs will be incurred in planning for activities related to CDBG and HOME goals. Estimated CDBG funding: \$192,244.40; Eligible activity under 24 CFR570.206(a)(1); National Objective: LMA 24 CFR Part 570.208(a)(1)(i)
	Target Date	June 2021
	Estimate the number and type of families that will benefit from the proposed activities	CNMI wide- Saipan, Tinian, and Rota with a population of 52,890; CDBG admin funds will maintained at the NMHC Central Office in Garapan, Saipan
	Location Description	CNMI-wide- Saipan, Tinian, and Rota with a population of 52,890; CDBG admin funds will be maintained at the NMHC Central Office in Garapan, Saipan.

	Planned Activities	CDBG planning and admin costs
2	Project Name	Tinian Children's Park Improvement
	Target Area	Tinian-wide (San Jose Village);
	Goals Supported	Public Facilities
	Needs Addressed	Non-Housing Community Development
	Funding	\$288,977.60
	Description	The Office of the Mayor of Tinian submitted a proposal for CDBG funds for the improvement of the Tinian Children's Park. There are limited number of parks in Tinian where children and youth can enjoy. The Tinian Children's Park is also a place where the community can gather. Eligibility citation: 24 CFR Part 570.201(c). National Objective: LMA ; The project meets Goal #7: To acquire construct or rehabilitate facilities for low-mod income communities and special needs populations. The project is categorized under "sports and recreational facilities". CDBG Funding: 288,977.60; National Objective: LMA 24 CFR Part 570.208(a)(1)(i)
	Target Date	September 2021
	Estimate the number and type of families that will benefit from the proposed activities	The project will benefit the entire island of Tinian where the population is 2,802, of which 2,367 or 84.5% are low-mod income.
	Location Description	Tinian- island wide
	Planned Activities	To rehabilitate the Tinian Children's Park
3	Project Name	Purchase of Two Wildland Trucks for the CNMI Department of Fire and Emergency Medical Services
	Target Area	Saipan
	Goals Supported	Public Services
	Needs Addressed	Non-Housing Community Development
	Funding	\$200,000

	Description	The Department of Fire and Emergency Medical Services (DFEMS) submitted a proposal for CDBG funds for the purchase of two wildlands truck to improve emergency medical services, emergency response capabilities, fire suppression, and firefighter safety on the island of Saipan. The Saipan Municipality currently has one wildland fire trucks that is outdated and beyond repair. With the increasing population on Saipan in its vast area and the scorching heat, at times over 100 degrees, there has been an increase of brush fires. Therefore, the project is absolutely necessary. These activities are eligible under 24 CFR Part 570.201(e). The project meets Goal #3- To support public services projects which includes but not limited to, healthcare, recreational programs, services for senior citizens, substance abuse programs, and <i>emergency medical services</i> . CDBG funding: \$200,000 National Objective: LMA 24 CFR Part 570.208(a)(1)(i)
	Target Date	September 2021
	Estimate the number and type of families that will benefit from the proposed activities	The two trucks will serve the entire island of Saipan, with a population of 52,890, of which 84% are low-mod income. The wildland trucks will be located in the Susupe and Capitol Hill Fire Stations. Therefore, the immediate service areas for the project is Susupe, Saipan, and Capitol Hill, Saipan. Susupe, Saipan- total population of 1,881 or 1,709 or 90% are low-mod income; Capitol Hill Saipan- total population of 2,680, of which 1,723 or 64% are low-mod income
	Location Description	Susupe, Saipan and Capitol Hill, Saipan
	Planned Activities	The planned activity is to purchase two wildland fire trucks for the island of Saipan to enhance fire management, which includes to aggressively address the wildfire in its early stages, stop the spread of fire, for fire preparedness and suppression, and to reduce fire impacts of Saipan's forestry-agriculture and the urban interfaces.
4	Project Name	Purchase of Personal, Protective Equipment for the Department of Fire and Emergency Medical Services (DFEMS)
	Target Area	Saipan, Tinian, and Rota
	Goals Supported	Public Facilities (Recreational Facilities)
	Needs Addressed	Non-Housing Community Development
	Funding	\$280,000

	Description	The CNMI Department of Fire and Emergency Medical Services submitted a proposal for CDBG funds for the purchase of personal, protective equipment for the CNMI Department of Fire and Emergency Medical Services. The PPEs will be distributed to the CNMI fire fighters (total of 148 fire fighters) This project placed third of the three projects selected, and therefore, although DFEMS request was for \$382,875, NMHC allocated \$200,000 for this particular project. DFEMS plans to submit an application for CDBG funds for additional PPEs in PY 2021. These activities are eligible under 24 CFR Part 570.201(c). CDBG Funding: \$200,000 National Objective: LMA 24 CFR Part 570.208(a)(1)(i)
	Target Date	September 2021
	Estimate the number and type of families that will benefit from the proposed activities	The project will benefit the entire island of Saipan with a population of 52,890 of which 44,556 or 84%, are low-mod income
	Location Description	Saipan ,Tinian, and Rota
	Planned Activities	To purchase personal, protective equipment (PPEs) for the CNMI D
5	Project Name	PY 2020 HOME Planning and Administrative Costs
	Target Area	Saipan, Tinian, and Rota
	Goals Supported	Sustain Affordable Housing Stock
	Needs Addressed	Affordable Housing
	Funding	\$69,591
	Description	HOME Planning and administrative costs for PY 2020; In the annual goals supported, all goals related to the HOME program was checked, as administrative costs will be incurred in planning for projects related to the HOME goals. HOME admin funded amount: \$_____ (15% of PY 2020 Allocation, \$69,591 + \$_____ (15% of expected HOME PI)= \$_____; Eligible activity under 24 CFR 92.207(a)(1)

	Target Date	June 2021
	Estimate the number and type of families that will benefit from the proposed activities	The figure below represents the estimated number of households (rehab) that will be assisted through the HOME Program. As such, admin costs will be incurred in planning for HOME projects (approximately 3 households every year).
	Location Description	CNMI-wide- Admin funds will be maintained at the NMHC Central Office in Garapan, Saipan
	Planned Activities	HOME administrative and planning costs
6	Project Name	Homeowner Investment Partnership (Homeowner Rehabilitation)
	Target Area	Saipan, Tinian, Rota
	Goals Supported	Sustain Affordable Housing Stock, Promote Fair Housing
	Needs Addressed	Affordable Housing
	Funding	\$394,349
	Description	The HOME program will provide assistance for the rehabilitation of low-mod income housing units of eligible applicants. HOME eligibility for new construction/rehabilitation/administrative costs citation: 92.205(a)(1). The figure below represents the number of units to be assisted annually; however, more than (2) units (up to 4 units) could be funded, depending on the funding amount and the amount of the loan to be disbursed. Program income will be used towards HOME-eligible activities. HOME funded amount: \$394,349 (PY 2020 allocation) + \$_____ (PI) = \$_____ Project meets goal #- To sustain the affordable housing stock
	Target Date	January 2022
	Estimate the number and type of families that will benefit from the proposed activities	To assist up to 3 households in Year 1 of the Consolidated Plan. NMHC will determine, depending on funding availability, the number of homes to be constructed or purchased with HOME funds

	Location Description	CNMI-wide- Admin funds will be maintained at the NMHC Central Office in Garapan, Saipan
	Planned Activities	Homeowner-rehab

6	Project Name	Homeowner Investment Partnership (Homeowner Rehabilitation)
	Target Area	Saipan, Tinian, Rota
	Goals Supported	Sustain Affordable Housing Stock, Promote Fair Housing
	Needs Addressed	Affordable Housing
	Funding	\$394,349
	Description	The HOME program will provide assistance for the rehabilitation of low-mod income housing units of eligible applicants. HOME eligibility for new construction/rehabilitation/administrative costs citation: 92.205(a)(1). The figure below represents the number of units to be assisted annually; however, more than (2) units (up to 4 units) could be funded, depending on the funding amount and the amount of the loan to be disbursed. Program income will be used towards HOME-eligible activities. HOME funded amount: \$394,349 (PY 2020 allocation) + \$_____ (PI) = \$_____ Project meets goal #- To sustain the affordable housing stock
	Target Date	January 2022
	Estimate the number and type of families that will benefit from the proposed activities	To assist up to 3 households in Year 1 of the Consolidated Plan. NMHC will determine, depending on funding availability, the number of homes to be constructed or purchased with HOME funds
	Location Description	CNMI-wide- Admin funds will be maintained at the NMHC Central Office in Garapan, Saipan
	Planned Activities	Homeowner-rehab
7	Project Name	HESG20 Planning and Administrative Costs
	Target Area	Saipan

	Goals Supported	Expand services to the homeless
	Needs Addressed	Homelessness
	Funding	\$79,870
	Description	As designated by the CNMI, NMHC will be conducting housing relocation and stabilization services for rapid re-housing and homelessness prevention assistance for eligible households. The CNMI plans to assist about (6) households on an annual basis, based on the funding allocation. The figures (in the goal outcome indicator) below represent the number of households to be assisted with rapid rehousing funds and homelessness prevention funds. In order for the households to be assisted, planning and admin costs will be incurred. Allocation breakdown is as follows: \$25,239.75 (housing relocation and stabilization services); \$8,000 (HMIS); Planning and Admin- \$5,990.25 (allocated to NMHC); \$24,464 (rapid re-housing assistance) and \$16,176 (homelessness prevention assistance). The total allocation breakdown equates to \$79,870 (ESG funded amount). Project meets goal #10- To provide services to the homeless. Eligibility Citation: 24 CFR 576.106,107,108. See NMHC HESG Budget, Appendix E in the Annual Action Plan
	Target Date	November 2021
	Estimate the number and type of families that will benefit from the proposed activities	4 households assisted with rapid rehousing funds 2 households assisted with homelessness prevention funds
	Location Description	Assistance will be provided to families who qualify for ESG. With the help of the case manager, the applicant will select a unit (owned by a private landlord). The units will be scattered within Saipan, therefore, there is no particular address where activities will be undertaken. NMHC's main office is located in Garapan, Saipan.
	Planned Activities	To provide rapid rehousing and homelessness prevention services which includes 10 months' rental assistance, security and utility deposit, and 10 months' utility allowance for households who qualify for the assistance. In addition, funds will be used for the HMIS, planning and admin, and housing relocation and stabilization services.
8	Project Name	Commonwealth Office of Transit Authority (COTA)
	Target Area	Saipan
	Goals Supported	Public Facilities

	Needs Addressed	Non-housing Community Development
	Funding	\$177,500
	Description	The Commonwealth Office of Transit Authority submitted a proposal for the acquisition and installation of pre-fabricated solar bus shelters. The project remains an alternate project, as it has not yet been funded and was included in the PY 2019 Annual Action Plan. The shelters will provide accommodation to bus passengers during the days of high tempered sun, unpleasant cold rain and dark nights, while the passengers await their designated buses. The shelters will be installed at the Commonwealth Health Center, Ironwood Homes (low-income housing) and Safety Highway (a widely used route on Saipan). These activities are eligible under 24 CFR Part 570.201(c). National Objective: LMA 24 CFR Part 570.208(a)(1)(i). The project meets goal #5- to construct or rehabilitate facilities, including recreational facilities and youth centers that will improve services to the general public. CDBG funded amount: \$177,500
	Target Date	September 2022 (if a priority project does not come to fruition)
	Estimate the number and type of families that will benefit from the proposed activities	The shelters will be situated in designated areas, of which (2) of the (3) shelters are situated in the same village of Gualo Rai, Saipan (Safety Highway and Ironwood), and (1) shelter will be situated in the village of Garapan, Saipan. Gualo Rai's Census Tract 6, block groups 1-3, with a total population of 2,404, with a low-mod population of 2,053 or 85.4%. Garapan's Census Tract 4, block groups 1-2, with a total population of 3,748, with a low-mod population of 3,344 or 89.2%. The activity is categorized as an area benefit activity as the facility aims to benefit an area where at least 51% of its residents are low-mod income.
	Location Description	Villages of Gualo Rai and Garapan, Saipan
	Planned Activities	Acquisition of pre-fabricated bus shelters, installation of the bus shelters, installation of solar units (including inverters, battery storage, and accessories)
9	Project Name	Kagman Community Park Phase II (Alternate Project 2)
	Target Area	Saipan
	Goals Supported	Public Facilities
	Needs Addressed	Non-Housing Community Development
	Funding	\$245,000

	Description	The Rotary Club of Saipan submitted a proposal for the Kagman Community Park Phase II. The project remains an alternate project, as it has not yet been funded and was included in the PY 2019 Annual Action Plan. Phase I was completed with PY17 CDBG and Rotary funds. The project will add features to the park where the community can congregate and provide a safe place for the youth and families to socialize and spend leisure time in a non-threatening environment. These activities are eligible under 24 CFR Part 570.201(c). National Objective: LMA 24 CFR Part 570.208(a)(1)(i). The project meets goal #5- to construct or rehabilitate facilities, including recreational facilities and youth centers that will improve services to the general public CDBG funded amount: \$245,000
	Target Date	September 2022 (if a priority project does not come to fruition)
	Estimate the number and type of families that will benefit from the	The project's immediate service area is the island of Saipan and is located in Kagman, Saipan. Census Tract: 16, Block groups: 1-2, with a total population of 4,194, of which 3,523 or 84% are low-mod income. The total population of the immediate service area is the number reflected in the goal outcome indicator.
	Location Description	Kagman, Saipan
	Planned Activities	Installation of playground equipment, swing set, concrete picnic tables and benches, outdoor fitness equipment complete with anchor support, constructed mound with slide and tires, construction of 4' wide accessible sidewalk from KCC building to the playground and basketball court.

AP-50 Geographic Distribution – 91.220(f)

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

Geographic Distribution

Target Area	Percentage of Funds
Saipan	62
Tinian	37

Table 55 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Discussion

The CPD entitlement grants will be allocated to the islands of Saipan, and Tinian. CDBG: Target areas are the islands of Saipan and Tinian, as the CDBG selection committee, based on a criteria, selected one project each located on Saipan and Tinian. ESG: Target area for ESG assistance is on the island of Saipan, as a large number of literally homeless and at risk of homelessness families reside on Saipan, the most populated island of the CNMI jurisdiction. HOME: HOME funds are targeted on all three islands as the need for affordable housing assistance to achieve homeownership or rehabilitate existing homes is clearly evident; however, because of the significantly larger population in Saipan, if not all, most of the HOME funds are targeted on the island of Saipan, as trend analysis reflects. Low income data for all three islands can be found in the below section "rationale for the priorities for allocating investments geographically.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	6
Non-Homeless	3
Special-Needs	0
Total	9

Table 56 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	6
The Production of New Units	0
Rehab of Existing Units	3
Acquisition of Existing Units	0
Total	9

Table 57 - One Year Goals for Affordable Housing by Support Type

Discussion

The CNMI proposes to provide rental assistance to approximately 6 households for this Action Plan year through the Emergency Solutions Grant Homeless Prevention and Rapid Re-Housing program. Additionally, the CNMI proposes to utilize HOME funds to rehabilitate the homes of low-and moderate-income homeowners to bring these units up to building code with energy efficient fixtures or accessibility features as a goal to stabilize or sustain the stock of housing. This Plan year, the CNMI does not anticipate acquiring any existing units to rehabilitate or convert for use of providing affordable housing or community facilities.

AP-60 Public Housing – 91.220(h)

Introduction

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

NMHC has set the following objectives to address the needs of public housing:

- Explore opportunities to leverage funds to create additional housing opportunities;
- Seek additional rental vouchers;
- Increase leasing-up activities;
- Maintain high occupancy rates by decreasing the number of vacant units;
- Continue renovation and modernization efforts for all existing units;
- Increase enforcement efforts;
- Promote Self-Sufficiency and asset development of assisted household;
- Ensure equal opportunity for all persons in need of housing assistance; and
- Achieve a HUD “high performer” rating under the Section 8 Management Assessment Program (SEMAP)

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

NMHC staff under the Asset Management Division and Field Offices continue to conduct outreach efforts to residents/tenants under the Section 8 Housing Assistance Payment Program – New Construction – so as to inquire about, encourage, and promote resident/tenant participation. NMHC is looking at options to assess, expand, and improve its current outreach efforts so as to promote resident/tenant participation.

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

The Northern Marianas Housing Corporation (NMHC) is the Public Housing Agency (PHA) in the CNMI and is not designated as “troubled”.

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

Introduction

The CNMI does not have a CoC in place to address the homeless situation. However, the CNMI plans to submit the second CoC grant application in September 2020, and if granted CoC funding, will be implementing a CoC program. Homelessness has been rapidly growing in the recent years which prompted the CNMI to shift from funding shelter operations to rapid re-housing and homelessness prevention activities since 2011. Through the PIT count conducted in January 2020, a total of 302 households, comprised of 1,307 persons were found to be homeless or at risk of homelessness. However, there continues to be a significant demand for housing assistance due to the recent disasters that made landfall in 2015 and 2018, sudden loss of jobs, overcrowding in homes, exorbitant costs of utilities, substandard housing, etc. There is no specific program specifically targeting veterans, and currently, there are no transitional or supportive housing programs in the CNMI. The NMHC, through the Section 8 Programs and ESG, is the only agency in the CNMI that provide housing assistance for more than a month's time. There are about 700+ households on the waiting list.

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

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

Allocate ESG funding to support the non-profit organizations who will be conducting case management for literally homeless and at risk of homelessness households; Support the work of non-profit organizations and the public sector providing assistance to very low and low -income individuals and special needs populations; Support the revitalization of programs implemented by the Transitional Living Center who offer services to those who are likely to become homeless after being discharged from a publicly funded institution and the Independent Living Center who offer life skill training to a special needs population; Continue in the planning phase to conduct a point in time survey (PY 2020) to gather more accurate information on homeless households in the CNMI, and once the data is gathered, apply for a CoC grant in order to meet the homeless needs in the CNMI.

Addressing the emergency shelter and transitional housing needs of homeless persons

As a goal in the next five years, plans to Support financing of transitional housing to provide temporary housing for homeless individuals, including those who are transitioning from drug rehabilitation centers and prison and support financing the construction of an emergency shelter to provide temporary housing for those who are seeking shelter from a disaster or who find themselves temporary homeless. NMHC hopes to build one or both types of project starting PY 2022. (emergency shelter or transitional housing facilities or both)

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

All the actions above address this section.

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

social services, employment, education, or youth needs

All the actions above address this section.

Discussion

The following activities below address each point above:

On an annual basis, NMHC will:

The CNMI currently does not receive HOPWA funds. To address the above sections pertaining to the subpopulations, NMHC established partnerships with the following agencies: Department of Fire and Emergency Management Services, Department of Public Safety, the judiciary system (Family Court), Karidat Social Services, Office of Vocational Rehabilitation, Council on Developmental Disabilities, Department of Community and Cultural Affairs, and the Community Guidance Center to accomplish the following: address the increasing homeless problem in the CNMI, involvement in the PIT survey, and hopefully, successfully implement a COC in the CNMI. Currently, the CNMI does not have programs for individuals being discharged from publicly funded institutions and systems of care, as traditionally, the families of such individuals take them in and provide assistance in any way possible. The DYS Shelter provides housing for runaway youth, neglected and abused youth, and youth who are victims of domestic violence (and therefore are homeless due to their situations). The Guma Espersansa Shelter provides housing to women and children who are victims of domestic violence. For the subpopulations transitioning of these shelters, as mentioned, traditionally, the families of such individuals take them in and provide assistance in any way possible. For those formerly homeless and assisted through the ESG Program, NMHC's case managers, ensures that the households (most of whom are special needs household) do not revert back to homelessness by proactively evaluating the families and provides them with resources/programs they can avail of to sustain their housing status. Due to its limited organizational capacity, NMHC, along with its private and public partners, are focusing on the general homeless population by conducting the point in time survey, as the first step. As time progresses, NMHC will work with its partners to expand its programs to assist specific subpopulations. As with the special needs populations, NMHC provides assistance through the HOME Program and ensures that CDBG-assisted projects can also accommodate the special needs population.

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

Introduction:

In the MA40 section, the barriers to affordable housing were identified. The three barriers were as follows: Minimum Wage and Employment, construction costs, and Challenges Faced by Persons with Disabilities.

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

Discussion:

Minimum Wage & Employment

The CNMI's current minimum wage is \$7.25 per hour. The current minimum wage does not allow room for families build or acquire an affordable home. The high cost of utilities, food, fuel, and other commodities are preventing families from affordable housing. Many households that cannot afford to obtain a decent home choose to live in substandard homes that do not have the proper sanitary facilities and adequate number of rooms to accommodate their household size. Developers attributed this increase to several factors including the rising cost of labor, materials, land, and utilities.

Construction Costs

A significant barrier to producing more affordable housing is the rising cost of development and the limited foreign labor capacity in the CNMI. The CNMI being geographically located in typhoon alley calls for stringent building codes to withstand severe weather, with winds of close to 200 MPH as demonstrated by Super Typhoon Yutu. According to NMHC's Asset Management Division, the average cost of construction is \$191,952 (CMU block concrete foundation), which has nearly tripled from 2015. Labor costs have directly impacted the cost of construction: The provisions of US Public Law 110-229 which phases out the CNMI's non-resident labor pool, commonly referred to as a "Commonwealth Worker" or "CW", have created an unprecedented labor quandary which has negatively impacted the CNMI's private sector. Coupled with this mandated reduction of foreign sourced labor is a significantly small populous resulting from out migration prompted by the jurisdiction's previous economic downturn. According to the 2010 CNMI Census, the CNMI's population declined nearly 22% from the previous decade, further shrinking the available labor pool required to support a recovering economy. According to the Government Accountability Office's (GAO) report, the elimination of the CNMI's non-resident labor pool would result in maximum 62% decrease in Gross Domestic Product (GDP). Given the current and projected demand for labor, the size the CNMI's domestic workforce and the uncertainties of continued extensions of the CW program, it is critical for the CNMI to properly plan and strategize its economic course. The CNMI, through its US Delegate to Washington DC, the construction industry in the CNMI, and businesses continue to advocate for restoration of H2-B Visa Waivers for construction workers and to increase the cap on the number of contract workers (particularly in the construction industry) from the Philippines and China.

Challenges faced by Persons with Disabilities

NMHC in collaboration with the Northern Marianas Protection and Advocacy System, Inc. (NMPASI) and Council for on Developmental Disabilities (CDD) identified the challenges encountered by individuals with disabilities. People with disabilities are suggesting that the program be brought to them. The following challenges were noted by their case manager at NMPASI: income criteria should be adjusted to reflect the current cost of living in the CNMI, timeframe to be given for people who are on the program, increased utility allowance to reflect the high cost of utilities in the CNMI, and provide home service to individuals with disabilities. The Council on Developmental Disabilities has identified the following barriers that persons with disabilities are faced with: application documents

are not accessible for visually impaired, need to provide transitional homes and expand rental housing for those who are homeless, in addition to the waiting list (for Section 8 programs) being too long, and the need to enforce Fair Housing Act of 1998. The CNMI will address other impediments through its continued partnership with NMPSI, Council on Developmental Disabilities, CNMI Office of Vocational Rehabilitation, Commonwealth Office Transit Authority, etc. The CNMI will strengthen its fair housing education efforts by providing additional training to NMHC's Fair Housing Officer and increase the number of fair housing workshops, targeted to persons with special needs.

AP-85 Other Actions – 91.220(k)

Introduction:

Obstacles to meeting underserved needs are funding (annual CPD programs) and organizational capacity.

Actions planned to address obstacles to meeting underserved needs

(Organizational Capacity) In the next year, NMHC will still maintain the FSS Program Coordinating Committee which serves as the advisory board for NMHC's FSS program. It shall assist in securing commitments of public and private resources for the operation of the FSS program and responsible for assisting with the development and implementation of the program. The PCC shall meet quarterly and may conduct business on an as-needed basis via email or telephone conferences. Membership in the PCC shall be drawn from a variety of agencies and individuals, which includes but is not limited to: human services agencies, state and local government, the community college, financial institutions, private business sectors, job training service providers, non-profit service providers, Section 8 resident, and NMHC Program and Housing Staff members and the FSS Program Coordinator. The closer link to the types of said agencies will enable us to work together and build organizational capacity, so that at the time a CoC is established in the CNMI, there would be sufficient staffing and resources to run a successful program, therefore, NMHC would be able to meet the needs of the underserved population such as the disabled, homeless, and elderly. (Funding) The allocation to the Section 8 and CPD programs are determined at the federal level. To possibly increase funding, as there is program income generated in the CDBG Program, program income generated from those projects will be used towards CDBG -eligible activities such as supportive services (public services), leveraging Section 8 funds to enhance Multifamily units (rehabilitation of housing units), and construction or rehabilitation of a shelter which serves households who are considered homeless (public facilities).

Actions planned to foster and maintain affordable housing

HOME funds are utilized for the development and rehabilitation of affordable housing, as well as services such as homebuyer education and first time homebuyer assistance to foster and maintain affordable housing in the CNMI. In the next year, NMHC will continue to administer the HOME Program and rehabilitate up to (3) homes. PY funding will be used for new construction and acquisition.

Actions planned to reduce lead-based paint hazards

LBP hazards are integrated into the Section 8 and ESG Policies and Procedures. The CNMI ensures that participants in the Housing Choice Voucher program and the Emergency Solutions Grant Program (rapid re-housing and homeless prevention activities) are educated on the hazards of lead based paint in rental housing, as part of the intake process. They are provided with brochures and will have to acknowledge the receipt of the "Watch Out for Lead Based Paint Poisoning" material. They are also advised of the hazards of lead based paint during orientations when new vouchers are issued. Also, at initial inspection of the rental housing unit (in both programs), a certified NMHC inspector must complete HUD Form 52580, an Inspection Checklist, to ensure that there is no potential lead hazard. If a hazard is identified, the problem must be mitigated by the landlord... As with the ESG Program, the Subgrantee fills in a Lead Based Screening Worksheet and at inspection of the unit, ensures that there are no lead based paint hazards based on the Habitability Standards Checklist. In the rare case which a landlord registers such a unit and tenant prefers the unit constructed before 1978, the above actions will be taken and a certified environmental agency would have to conduct lead abatement procedures. As with the ESG program, the Subgrantee encourages the tenant to select a unit constructed after 1978, in order to prevent additional mitigation steps, which would require additional funding. The ESG program is very limited in funding, as opposed to other CPD programs.

The following are required activities to address lead based paint: (integrated into the HOME Policies and Procedures)

1. Notification: Lead Hazard Information Pamphlet- occupants, owners, and purchasers must receive the

EPA/HUD/Consumer Project Safety Commission lead hazard information pamphlet, or an Reapproved equivalent¹⁴
Disclosure- property owners must provide purchasers and lessees with available information or knowledge regarding the presence of lead based paint and lead based paint hazards prior to selling or leasing a residence¹⁵
Notice of Land Hazard Evaluation or Presumption- occupants, owners, and purchasers must be notified of the results of any lead hazard evaluation work or the presumption of lead based paint or lead hazards.

2. Notice of Lead Hazard Reduction Activity- Occupants, owners, and purchasers must be notified of results of any lead hazard reduction work.

3. Lead Hazard Reduction- methods described include paint stabilization, interim controls, standard treatments, and abatement.

As in all other HUD-assisted programs implemented in the CNMI, NMHC will follow the same lead-based paint procedures by providing information on the hazards of lead-based paint to the tenant during orientation, provide brochures and materials on lead-based paint to the tenant, and have an NMHC-certified inspector conduct an inspection of the HTF-funded unit and complete a HUD Form 52580, to ensure that there is no potential lead hazard. If a hazard is identified, NMHC will mitigate the problem. By following these procedures in the HTF Program, there is a reduction in lead-based paint hazards not only in HUD-assisted units but total units in the CNMI

Actions planned to reduce the number of poverty-level families

1. Collaborate with the Department of Labor, the Community Development Institute of the Northern Marianas College, the Northern Marianas Trades Institute who offer education and employment training to develop plans that will assist families who live below poverty level, most of which NMHC serves through the Section 8 Program. Assist up to (25) households, the target number of families, to be admitted into the FSS Program.

2. Collaborate with the Independent Living Center who offer life skills training to the disabled population, most of which NMHC serves through the HOME loan and Section 8 Program. Assist up to (5) HUD-assisted households every year.

3. Collaborate with the Department of Community and Cultural Affairs FSS Program to enroll up to (5) families who are currently in the Section 8 FSS Program into the Economic Opportunity for Self-Sufficiency Program to obtain on the job training.

4. Maintain the Emergency Solutions Grant Program and assist up to (6) families with temporary financial assistance. The Subgrantee will also offer information on specific resources for employment, training, and education and offer guidance on certain matters such as budgeting, energy conservation in the home, etc.

5. Work proactively with current Section 8 households and admit up to (25) families into the FSS Program, so they are able to gain self-sufficiency, and in turn, be able to maintain housing stability, obtain education and/or employment, and get out of poverty.

In addition, by providing rental housing to an extremely-low income household and working with the family to achieve self-sufficiency and maintain affordable housing, NMHC is reducing the number of poverty-level families in the CNMI.

Actions planned to develop institutional structure

The CNMI continues to be committed to enhancing and improving the institutional structure supporting the administration of the CNMI's Annual Action Plan. Frequent assessment of policies and practices conducted by

NMHC's management and Board of Directors are performed to improve processes in the programs. In addition, management of CPD funded Subrecipients are performed to ensure that the activities of the ConPlan through each Annual Action Plan year is carried out accordingly and remains compliant with HUD regulations. In the coming year, primary areas for institutional strengthening will include:

- 1) More proactive involvement in various government and non-profit committees (such as the Developmental Disability Council, Headstart Committee, Housing Task Force, etc.) to enhance social services to clients (inclusive of NMHC's clients)
- 2) Continuously work with the Governor, Lt. Governor, Legislature, and the Mayors of Saipan, Tinian, and Rota to identify community planning and development needs
- 3) Continuously work with the Family Self Sufficiency Committee which is comprised of agencies such as the Office of Vocational Rehabilitation, Northern Marianas College, Protection and Advocacy groups, Department of Labor, and Karidat Social Services to successfully enroll families who wish to gain self-sufficiency and exit out of the Section 8 Program

In addition, One of the goals mentioned above in developing institutional structure is for the NMHC to continuously work with the Administration and the Mayors of Saipan, Tinian, and Rota to identify community planning and development and housing needs. One of the housing unmet needs is the availability of affordable, rental housing units in the CNMI. Due to the devastation of Super Typhoon Yutu in October 2018 and the significant number of families whose homes were destroyed and most of those families seeking rental units, it has been a challenge to identify available and affordable rental units in the CNMI for the past year. Because of this, NMHC has work collaboratively with government and non-profit agencies, took the lead in the Housing Task Force and continue to work with other agencies to ensure that unmet housing needs are met. The CNMI continues to be committed to enhancing and improving the institutional structure supporting the administration of the CNMI's Annual Action Plan.

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

The NMHC continues to coordinate with various social service providers such as Karidat Social Services, Department of Labor- Workforce Investment Agency, Northern Marianas College- Community Development Institute, Mental Health Planning Council, Council on Developmental Disabilities, Office of Vocational Rehabilitation, Northern Marianas Protection and Advocacy Systems Inc., etc. to ensure that housing, health, and social service activities are part of the island wide strategy to end homelessness , improve housing stability and job retention for families and individuals. The NMHC also newly implemented the Family Self--Sufficiency Program which links HCVP tenants to various community programs. The NHMHC aims to enroll about 25 families into the program within the next year.

In addition, a goal of NMHC (mentioned above) in enhancing coordination is to continuously collaborate with various social service providers such as Karidat Social Services, Department of Labor, the Mental Health Planning Council, Office of Vocational Rehabilitation, etc. to ensure that housing, health, and social service activities are part of the island wide strategy to end homelessness, and improve housing stability and job retention for families and individuals.

Program Specific Requirements

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

Introduction:

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

1. The total amount of program income that will have been received before – *No program income received.
the start of the next program year and that has not yet been reprogrammed
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan –* Not applicable. No Section 108 loan guarantees will be used.
3. The amount of surplus funds from urban renewal settlements –* Not applicable.
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan. - *Not applicable.
5. The amount of income from float-funded activities- *Not applicable.

Total Program Income

Other CDBG Requirements

1. The amount of urgent need activities- Not applicable. No urgent need activities are identified in this Plan.

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

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

The CNMI does not intend to utilize other forms of investment. For this action plan year, funds are being utilized to provide eligible activities identified in Section 92.205. NMHC will continue to administer the HOME Program for eligible and qualified homeowners to rehabilitate, construct, and provide for the purchase or acquisition and repair of homes. The agency will continue to uphold its mission statement to provide the very low to low-income families with homes that are decent, safe, sanitary, and affordable.

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

The guidelines as cited from the HOME Policies and Procedures for Homebuyer Activities, Section X, Subpart 9:

Foreclosure and Resale. If the HOME assisted property is subject to resale terms, NMHC has two options:

Resale Option 1: NMHC will ensure the sale of the HOME assisted property to another eligible low income homebuyer under the terms of the resale agreement. OR

Resale Option 2: NMHC will repay the full amount of HOME assistance to the CNMI HOME account regardless of the amount collected at foreclosure sale.

Under Resale Option 1, NMHC may provide assistance to the new homebuyer. However, the total amount of the original and any additional HOME assistance may not exceed the maximum per unit subsidy amount.

Foreclosure and Recapture. If the HOME assisted property is subject to recapture terms, NMHC has two options:

Recapture Option 1: NMHC will recapture and pay to the CNMI HOME account the net proceeds from the foreclosure sale of the property in accordance with the recapture terms. OR

Recapture Option 2: NMHC may purchase the HOME assisted property at foreclosure sale and additional HOME funds may be spent. However, the total amount of the original and additional HOME funds spent may not exceed the maximum per unit subsidy amount.

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

The guidelines as cited from the *HOME Policies and Procedures for Homebuyer Activities, Section X, Subpart 9*:

Foreclosure. NMHC may use its right of first refusal, as set forth in the loan documents, written agreement with homebuyer, and restrictive deed or land covenant, to purchase the housing before foreclosure or deed in lieu of foreclosure to preserve affordability. Foreclosure triggers the HOME resale or recapture agreement enforceable through the restrictive deed or land covenant.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The CNMI does not intend to use HOME funds to refinance existing debt of any kind as an option but, on a case-by-case basis, may use the funds where it is deemed necessary to preserve affordability and as long as it justifies the HOME Program's intended purpose.

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

1. **Include written standards for providing ESG assistance (may include as attachment)**
 - a) Standard policies and procedures for evaluating individuals' and families' eligibilities under ESG.**Homeless Prevention and Rapid Re-Housing**

Note: In May 2018, NMHC was designated as the administrator of the ESG Program. As program administrator, NMHC focuses ESG program funds on individuals and families who are literally homeless. The NMHC will announce the availability of ESG funding through a public notice. The public notice will consist of the following:

- ESG Program information
- ESG Allocation amount (itemized by components (Homeless Prevention and Rapid Re-Housing, including the anticipated funding amount for each component)
- Eligibility Requirements
- Indicators of Homelessness
- Eligibility Criteria
- Risk Factors of Homelessness
- Grantee (NMHC) Information

Application for ESG Assistance

Applicants will walk into the NMHC Office and apply for ESG assistance through the following application process:

1) ESG Pre-Application

Applicants will pick-up, fill-out, and submit their completed ESG Pre-application to NMHC. After completion and submission of the ESG Pre-application, applicants will be placed on a waitlist until ESG funds become readily available. Upon funding availability, ESG case management staff will assess pre-applications in the order received to determine applicant pre-eligibility based on the following criteria:

- To be pre-eligible for Rapid Re-housing assistance, households must be “Literally” homeless
- To be pre-eligible for Homeless Prevention assistance, households must be “At-Risk” of homelessness

Pre-eligible applicants will be prioritized in the following order: (1) Rapid Re-housing; (2) Homeless Prevention.

2) Initial consultation and assessment

After determination of pre-eligibility, ESG case management staff will schedule an appointment to meet with pre-eligible applicants to conduct an initial consultation and for further assessment of household eligibility. At initial consultation and assessment, applicants will be provided with a checklist of applicable documents required for submission within (15) business days of initial consultation for verification of household information and for final eligibility determination.

Verification of household information will include the following:

- Proof of housing status
- Proof of Income
- Proof of disability
- Criminal History

In order to receive ESG Rapid Re-housing or Homeless Prevention financial assistance, households must meet at least the following minimum criteria:

- 1) Initial consultation and eligibility determination: the household must receive at least an initial consultation and eligibility assessment with ESG case management staff or other authorized representative who can determine eligibility and the appropriate type of assistance needed;
- 2) Income: For Rapid Re-housing, the household must have no income at initial assessment and total household income must be at or below 30% of the AMI at re-evaluation. For Homeless Prevention, the total household income must be at or below 30% of the AMI.

- 3) Housing Status: the household must be either literally homeless (to receive Rapid Re-housing assistance) OR at-risk of homelessness (to receive Homeless Prevention) AND must have no appropriate subsequent housing options and must lack sufficient resources and support networks to obtain or remain in permanent housing.
- 4) Criminal history: a criminal history back ground check will be conducted for all adult household members for criminal activity.

3) ESG Application Review

After verification of applicant household information, based on all required documents submitted, ESG case management staff will submit applicant household assessment to the ESG application review team for final eligibility determination. The ESG application review team will consist of (2) NMHC staff who are able to determine applicant eligibility based on the Homeless Definition.

The new definition of “homelessness”, according to the Homeless Emergency Assistance and Rapid Transition to Housing Act includes four broad categories. In order for a household to be eligible for HESG assistance, all households must meet the definition of homelessness. The definition is as follows:

- People who are living in a place not meant for human habitation, in an emergency shelter, in transitional housing, or exiting an institution where they temporarily resided if they were in a shelter or place not meant for human habitation before entering that institution. The only significant change from existing practice is that people will be considered homeless if they are exiting an institution where they resided up to 90 days (formerly 30 days) and were homeless immediately prior to entering that institution.
- People who are losing their primary nighttime residence, which may include a motel or hotel or a doubled-up situation, within 14 days and lack resources or support networks to remain in housing. HUD had previously allowed people who were being displaced within 7 days to be considered homeless. The regulation also describes specific documentation requirements for this category.
- Families or children or unaccompanied youth who are unstably housed and likely to continue in that state. This is a new category for homelessness, and it applies to families with children or unaccompanied youth (up to age 24) who have not had a lease or ownership interest in a housing unit in the last 60 or more days, have had two or more moves in the last 60 days, and who are likely to continue to be unstably housed because of disability or multiple barriers to employment.
- People who are fleeing domestic violence, dating violence, sexual assault, stalking, or other dangerous life-threatening situations related to violence; have no other residence; and lack the resources of support networks to obtain other permanent housing. This category is similar to the current practice regarding people who are fleeing domestic violence.

a) Policies and Procedures to determine and prioritize which eligible families and individuals will receive homelessness prevention assistance and which eligible families will receive rapid rehousing assistance.

The HESG application review team will determine final eligibility and type of assistance needed for each HESG program applicant through a scoring system based on the Rapid Re-housing and Homeless Prevention criteria. Prioritization will be given in the order of greatest to least points. Overall, program assistance will be given in the following order: (1) Rapid Re-housing; (2) Homeless Prevention. The ESG application review team will score

each application until maximum number of applicants have been selected for program assistance. Applicants deemed ineligible for program assistance will be notified through mail. Rapid Re-housing activities and homelessness prevention activities will include housing relocation and stabilization services. For a household to receive rapid re-housing assistance, the household must be literally homeless, as per the HEARTH Act, HUD's final rule definition. For a household to receive homelessness prevention assistance, they must be at risk of homelessness and have a total household income that is either at or below 30% of the AMI.

b) Policies and Procedures for local coordination amongst shelters and service providers

NMHC will be the lead agency in coordinating policies and procedures with emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers. The CNMI CoC was established in May; however, the CNMI does not have a centralized coordinated assessment system. The NMHC, through networking and discussions with the (2) current emergency shelters in the CNMI, which specifically serves youth (Division of Youth Services) and domestic violence victims (Guma Esperansa), along with other government entities, have contacted several service providers for their input and to fulfill the consultation requirement of the substantial amendment. Several agencies contacts include the Karidat main office (operates the Guma Esperansa Program) and the Northern Marianas Coalition Against Domestic and Sexual Violence in the CNMI. The CNMI currently does not have a non-profit organization that solely administer homelessness prevention and rapid re-housing assistance programs, other than the only (2) shelters in the CNMI that serve specific populations – neglected and abused youth and domestic violence victims. The Northern Marianas Protection and Advocacy Systems Inc., a non-profit organization that administered the HPRP Program, serves mainly the disabled population; however, they have expanded their services to assist households who were “at-risk” of homelessness and literally homeless, as Karidat a non-profit charitable institution who provide short term rental assistance and operates a domestic violence shelter, did not have the capacity to run the HPRP program at the inception of the grant. The NMPASI has been a vital part in providing comments and input on what worked and what did not work for the HPRP program. The NMHC will continue to consult with them with regards to streamlining procedures for the ESG Program and will continue to expand its networking efforts with more government agencies and non-profit organizations in the CNMI.

c) Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention and rapid re-housing assistance

An eligible household will receive 100% rental assistance, including security deposits. Utility deposits, and utility payment's assistance, if applicable. Also, if applicable to a household, the household may receive moving costs' assistance and rental arrears assistance. A lease agreement between the tenant and the landlord must be in place, and NMHC must be provided with a lease agreement in order for rental payments to be made. An original invoice certified by the utility company must be submitted to the grantee for the utility deposit payment. Also, a rental assistance agreement between NMHC and the landlord must be in place and must set forth the terms under which rental assistance will be provided, including the requirements that apply under section 24 CFR 576.106(e). The landlord must give NMHC a copy of any notice to the tenant to vacate the housing unit, or any

complaint used under state or local law to commence an eviction against the tenant. Rental assistance payments will not be made if the client is receiving rental assistance from another public source at the same time period.

- d) Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.

Subject to the general conditions under §576.103 and §576.104, the NMHC may provide a program participant with up to 24 months of rental assistance during any 3-year period. Rental assistance includes: short-term rental assistance (up to 3 months of rent), medium term rental assistance (more than 3 months but not more than 24 months), and payment of rental arrears, which consists of a one-time payment for up to 6 months of rent arrears, including any late fees on those arrears. Program participants receiving rapid re-housing assistance will be re-evaluated at least once a year and program participants receiving homelessness prevention assistance will be re-evaluated at least once every 3 months. No program participant will receive more than 24 months of assistance in a 3-year period.

- e) Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receive assistance or the maximum number of times the program participants may receive assistance.

An eligible household may avail to the following assistance under the rapid re-housing and homelessness prevention components: moving costs, security deposits, utility deposit, utility payments, housing stability case management, housing search and placement, credit repair, budgeting, money management, and landlord-tenant mediation. The prioritization of eligible families for both rapid re-housing and homelessness prevention services will be determined by the ESG application review team. **Homelessness Prevention:** Only persons who are below 30% of Area Median Income (AMI), and who are imminent risk of homelessness according to the HEARTH Act definition, and who otherwise lack adequate resources to prevent homelessness will be eligible for homelessness prevention assistance. NMHC's case manager must document household income information and proof that homelessness is imminent, and maintain this documentation along with client data. No financial assistance may be provided to a household for a purpose and time period supported by another public source. **Rapid Re-housing:** Only persons who are literally homeless in accordance with the HEARTH Act definition will be eligible for HESG rapid re-housing assistance. NMHC's case manager must document that the household is "literally" homeless and maintain documentation, along with client data. No financial assistance may be provided to a household for a purpose and time period supported by another public source.

NMHC's case manager must achieve the following: work closely with the household to acquire and maintain stable and affordable housing, provide information and encouragement for the household to avail of other services that would help them achieve self-sufficiency, be able to support the household by providing the follow-ups and address any barriers that may preclude them from maintaining stable housing, and to help the households set goals and develop a housing plan.

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

The CNMI CoC was established in May 2016; however, the CNMI does not have a centralized or coordinated assessment system. All referrals for housing assistance from other organizations are transmitted to NMHC for assistance.

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

The NMHC will publish a Notice in the newspapers soliciting proposals from both the government and non-profit organizations. The Notice is publicized for a period of (30) days, and during that time period, (3) public hearings are held (one from each CNMI jurisdiction) to meet with agencies who may be interested proponents. Once the proposals are submitted, the evaluation committee comprised of (8) members ((3) of which are Board of Directors from each jurisdiction) select a proposal based on the following:

- The applicant's history of providing effective shelter or prevention services to the homeless, and of successfully operating performance-based grant-funded programs
- The applicant's effective coordination with organizations in their local "continuum of care", to address identified gaps in services for the homeless and improve outcomes for participants
- The applicant's ability to transition street or unsheltered homeless participants or shelter residents to permanent housing, and/or prevent homelessness for families and individuals who are at risk of homelessness.

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

The NMHC is in the process of evaluating current (or future) householders assisted through ESG. The following factors are considered in selecting a homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services under ESG:

- 1) Mental capacity / ability to make sound decisions
- 2) Capability (will be determined through re-evaluations conducted by Subgrantee) to maintain housing stability after assistance
- 3) Compliance with the program regulations during the individual's assistance period

5. **Describe performance standards for evaluating ESG.**

The following performance standards are as follows: reduction in the number of homeless household (homelessness prevention) and the reduction in the number of homeless households, both sheltered and unsheltered (rapid re-housing). Also, general performance standards will include: unduplicated number of persons or households assisted from emergency shelters / streets into permanent housing and the unduplicated number of persons or households prevented from becoming homeless.

