



# NORTHERN MARIANAS HOUSING CORPORATION



P.O. BOX 506514, Saipan, MP 96950-6514

Email: [nmhc@nmhc.gov.mp](mailto:nmhc@nmhc.gov.mp) | Website: <http://www.nmhc.gov.net>

Tel Nos. 670-234-6866/234-9447; Fax No: 670-234-9921

**Ralph DLG. Torres**  
Governor

**Arnold I. Palacios**  
Lt. Governor

NMHC will make necessary arrangements for persons with disabilities. If you should require any special accommodations, please contact the Deputy Corporate Director 670-285-2146.

**AMENDED**

## NOTICE TO THE PUBLIC COMMENT

### Substantial Amendment to the Five Year Consolidated Plan (2015-2019) and Program Year 2019 Annual Action Plan

July 14, 2020

The Northern Marianas Housing Corporation (NMHC) announce the availability for public review and comment, the Substantial Amendment to the Five-Year Consolidated Plan (2015 – 2019) / Annual Action Plan Program Year 2019.

NMHC's Citizen Participation Plan has triggered the need for a substantial amendment to both the Five-Year Consolidated Plan (2015- 2019) and the Annual Action Plan for Program Year 2019. The CNMI is seeking the public's comments to amend both the Five-Year Consolidated Plan (2015-2019) and the Annual Action Plan for the Program Year 2019 to include additional Community Development Block Grant (CDBG) made possible through the Coronavirus Aid, Relief, and Economic Security (CARES) Act to address the COVID19 pandemic in the CNMI. This is the second allocation for CDBG-COVID.

Program	Allocation	Project Description
CDBG-COVID	\$274,635	Emergency Housing Assistance (Mortgage Assistance); Planning and Administrative Costs

The CNMI seeks to amend its PY 2019 Annual Action Plan to reflect actions needed to expedite the CNMI's response to CoVid19 and to allocate funds to activities which will serve the low-moderate income population amidst the CoVid19 pandemic and which meets the HUD National Objectives.

The drafted Substantial Amendment to the Five-Year Consolidated Plan (2015 – 2019)/Annual Action Plan Program Year 2019 is available for review at the NMHC Office in Garapan and will be made available for review on the NMHC website and NMHC Facebook page beginning Tuesday, July 14, 2020. In addition, due to new protocols to mitigate the spread of CoVid19, NMHC will be hosting virtual hearings through the following online forums on Thursday, July 16, 2020 at 10:00 a.m.

- 1) Social Media- FB Live
- 2) Zoom Video and Teleconferencing  
Meeting ID: 889 6221 9873  
Password: 169740
- 3) NMHC Website Feedback

The general public will be given the opportunity to provide comments at the virtual hearings. All written comments should be submitted through the NMHC website at [www.nmhc.gov.net](http://www.nmhc.gov.net) or delivered to the Drop Box located at the NMHC Office Building in Garapan, Saipan no later than Monday, July 20, 2020. For further information, please contact Zenie Mafnas, Deputy Corporate Director, at 670-285-2146.

/s/ Jesse. S. Palacios  
Corporate Director

# Substantial Amendment to the PY 2019 Annual Action Plan

Note: Amendments are in red font below. A star is indicated to the right margin to reflect all amendments made to this Plan.

## Executive Summary

### AP-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 Third Year Annual Action Plan (Program Year 2019) which covers October 1, 2019 – September 30, 2020. The Plan outlines the planned uses and goals for CDBG, HOME, 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. Torres, 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. Similar goals and priorities were identified, all of which we share the same vision and that is to improve the quality of life for the citizens of the CNMI through economic development projects which will provide economic opportunities for the low and moderate income population, public facilities which will enhance the community, energy efficient projects which will address the significant utility costs currently facing the CNMI, and recreational facilities, most especially for the elderly and youth to utilize. **See Appendix B:** House Joint Resolution 21-3, authorizing the CNMI to submit its Annual Action Plan for PY 2019.

#### 2. Summarize the objectives and outcomes identified in the Plan

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

These goals and objectives were identified based on the needs assessment of the community, prior year performance, housing market analysis, and various agency State plans and were indicated in the Program Year 2015-2019 Five Year Consolidated Plan. The goals are:

1. Special needs, low-to moderate-income, and extremely low income housing
2. Increase homeowner education and counseling

3. Promote Fair Housing
4. Sustain Affordable Housing Stock
5. Economic Development
6. Public facilities and Improvements
7. Public Services
8. Neighborhood Revitalization
9. Energy Efficiency/Renewable Energy
10. Amendment to include: Disaster Response and Recovery (inclusive of a pandemic response and recovery)



### **3. Evaluation of past performance**

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

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 \$7M in CDBG funds to support the various CDBG community projects that have benefited the island's various populations. The CNMI is currently working on its PY 2017 projects which are still ongoing: the Rehabilitation and Expansion of the Koblerville Youth Center and the Rehabilitation of the Kagman Community Center which will directly serve LMA communities and meet the Con-Plan priorities of recreational facilities and facilities that will improve services to the general public, most especially for the CNMI children and youth. As with the PY 2018 projects, the CNMI made a decision to postpone all projects, in order to reprogram PY 2018 funds towards disaster-related projects, particularly the Purchase of Modular units to be used as Transitional Housing on the islands of Saipan and Tinian. Due to circumstances beyond the CNMI and NMHC's control, the purchase and installation of transitional housing was not possible. For the next program year, NMHC will re-instate the PY 2018 projects. 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 \$3M 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 five years

injected about \$460K of ESG monies to provide shelter, homeless prevention, and rapid re-housing services. The CNMI continues to meet its timeliness test.

#### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

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 Action 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, all Annual Action Plans must be made available for a total of 30 days for the public to provide comment. See **Appendix F for the CPP**



**Substantial Amendment: See Amended Citizen Participation Plan**

#### **5. Summary of public comments**

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

See Appendix F for CPP

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

No comments received.

#### **7. Summary**

No comments received.

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

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

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

Agency Role	Name	Department/Agency
Lead Agency	NORTHERN MARIANA ISLANDS	
CDBG Administrator	NORTHERN MARIANA ISLANDS	Community Planning and Development Division
HOME Administrator	NORTHERN MARIANA ISLANDS	Community Planning and Development Division
ESG Administrator	NORTHERN MARIANA ISLANDS	Community Planning and Development Division

**Table 1 – Responsible Agencies**

**Narrative (optional)**

Zenie P. Mafnas, Deputy Corporate Director (CDBG, ESG, and NSP Programs)

Christopher Pangelinan, Mortgage and Credit Manager (HOME, NSP, and HTF Programs)

Nikkonia Tudela, Special Assistant to Housing (works mainly in the Section 8 and HCV and Multifamily Programs)

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**

Jesse S. Palacios, Corporate Director; Zenie P. Mafnas, Deputy Corporate Director

Northern Marianas Housing Corporation

PO Box 500514

Saipan, MP 96950

670-234-6866

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

Over the years, NMHC has strengthened its ties with the limited social service providers and non-profit organizations in the CNMI. NMHC continues to be proactive in their marketing efforts to assist individuals and households who are without a safe, sanitary, and decent home and works collaboratively with the private and governmental health, mental health and service agencies, to assist the homeless and non-homeless special needs populations. As NMHC strives towards establishing a Continuum of Care by Year 3 of ConPlan, the agency will continue to enhance coordination and consult with various pertinent agencies in the CNMI. Although a CoC was not established in Year 4 (PY 2018), NMHC did establish a CNMI Homeless Coalition in PY 2018, conducted a PIT count, gathered all the necessary data to apply for a CoC Grant. The CNMI did apply for a grant in PY 2018; however, the CNMI was not funded. The CNMI plans to submit a CoC grant in September 2019. The CNMI Homelessness Coalition Board is comprised of representatives from the Division of Youth Shelter, Karidat Social Services, Salvation Army, Division of Youth Affairs, and the Northern Marianas Coalition against Domestic and Sexual Violence.

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

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 Karidat Social Services, Salvation Army, Drug Court, Empty Vessel Ministries, CARE Organization, Northern Marianas Coalition Against Domestic Violence and Sexual Assault, 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. **See Appendix C: Attendance Sheets for CoC meetings** that occurred throughout last program year.

### **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, 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. NMHC also communicates with Karidat Social Services, the agency who oversees temporary housing funds and operates the domestic violence shelter, frequently, to particularly discuss homelessness issues. With this said, NMHC, through its ESG program, provides financial assistance to homeless individuals and families and families with children. 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. Although NMHC did not receive CoC funds, despite its application efforts, NMHC will be a collaborative applicant with the CNMI Homeless Coalition, to apply for CoC grant funds in September 2019 grant application. A Point in Time Count was conducted in March 2019, as part of the requirement for the CoC application. If the CNMI is funded, NMHC will be able to progressively meet the high demand for rapid rehousing and homelessness prevention services. Currently, through the ESG Program, NMHC is only able to fund 4-6 households a year. **See Appendix C: Attendance Sheets for CoC meetings** that occurred throughout last program year.

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

The 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). At that time, a unanimous decision was made to sub-grant HESG funds to Karidat Social Services. However for the next program year, NMHC will be the designated administrator of HESG funds who will directly provide homelessness prevention, rapid re-housing services, and housing relocation and stabilization services. **See Appendix D for HUD's Designation to NMHC and Appendix E: HESG Policies and Procedures and Appendix I: PY 2019 Karidat Budget** were also reviewed and were not amended since 2011. In December of every year, for the past two years, NMHC published a notice of public hearings for the funding availability of CPD funding. 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 2011 remain the same for ESG, since there is a greater, positive impact in allocating to rapid re-housing and homelessness prevention activities. The shelters continue to receive funds from other Grantor agencies for their shelter operations **See Appendix C: Attendance Sheets for CoC meetings** that occurred throughout last program year.

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

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	21st CNMI Legislature
	<b>Agency/Group/Organization Type</b>	Other government - Local Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The 21st CNMI Legislature consulted with NMHC and identified the top two priority needs: Infrastructure and Housing
2	<b>Agency/Group/Organization</b>	CNMI Department of Labor
	<b>Agency/Group/Organization Type</b>	Services-Employment Other government - Local Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Dept. of Labor consulted with NMHC on funding eligible activities such as public services to provide workforce development training, in coordination with DOL, for low-mod income individuals, most of whom are participants in the HUD-assisted programs, so they become self-sufficient.
3	<b>Agency/Group/Organization</b>	Office of the Mayor of Saipan
	<b>Agency/Group/Organization Type</b>	Other government - Local Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Economic Development Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Mayors of Saipan, Tinian, and Rota were consulted and they have demonstrated the need for mainly public facilities, specifically recreational facilities and infrastructure upgrades on the islands of Saipan, Tinian, and Rota. These types of projects are being sought after to promote the local economy, health and wellness, youth activities, and public safety. The Mayors have also recommended economic development activities for future projects to increase economic efficiency and reduce the poverty level in all jurisdictions.
4	<b>Agency/Group/Organization</b>	Office of the Mayor of Rota
	<b>Agency/Group/Organization Type</b>	Other government - Local Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Mayors of Saipan, Tinian, and Rota were consulted and they have demonstrated the need for mainly public facilities, specifically recreational facilities and infrastructure upgrades on the islands of Saipan, Tinian, and Rota. These types of projects are being sought after to promote the local economy, health and wellness, youth activities, and public safety. The Mayors have also recommended economic development activities for future projects to increase economic efficiency and reduce the poverty level in all jurisdictions.
5	<b>Agency/Group/Organization</b>	Office of the Mayor of Tinian
	<b>Agency/Group/Organization Type</b>	Other government - Local Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Economic Development Anti-poverty Strategy

	<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>The Mayors of Saipan, Tinian, and Rota were consulted and they have demonstrated the need for mainly public facilities, specifically recreational facilities and infrastructure upgrades on the islands of Saipan, Tinian, and Rota. These types of projects are being sought after to promote the local economy, health and wellness, youth activities, and public safety. The Mayors have also recommended economic development activities for future projects to increase economic efficiency and reduce the poverty level in all jurisdictions.</p>
6	<p><b>Agency/Group/Organization</b></p>	<p>Department of Community and Cultural Affairs</p>
	<p><b>Agency/Group/Organization Type</b></p>	<p>Services-Children  Services-Elderly Persons  Services-Victims of Domestic Violence  Services-homeless  Services - Victims  Child Welfare Agency  Other government - Local  Planning organization</p>
	<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Homelessness Needs - Unaccompanied youth  Homelessness Strategy  Non-Homeless Special Needs  Anti-poverty Strategy</p>

	<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>The Department of Community and Cultural Affairs comprises a variety of divisions. NMHC mainly consulted with the Office of Aging, the Division of Youth Shelter, and Guma Esperansa Shelter (victims of domestic violence). The Office of the Aging serves specifically the elderly population and the Division of Youth Center Services Shelter serves children and youth who have become homeless due to child abuse, neglect, or domestic violence (parents). The GUMA Esperansa serves women and children who are victims of domestic violence. Improved coordination with these agencies allow them to refer the elderly clients to NMHC to avail of the Section 8 and HOME programs. As with the DYS and Guma Esperansa Shelters, NMHC continues to assess the need for HESG funds for shelter operations, as opposed to rapid re-housing assistance. We found that rapid re-housing and homelessness prevention assistance has a greater impact on families, as both shelters continue to receive other federal grants for shelter operations and essential services. The DCCA also serves low income families with the Childcare Fund, which allows them assistance for day care, while the parents are at their jobs. DCCA is part of the homelessness strategy/CoC consultation committee assisted NMHC in conducting the PIT survey in PY 2018 and re-applying to for a CoC grant in September 2019 (within PY 2018).</p>
7	<p><b>Agency/Group/Organization</b></p>	<p>Office of the Governor-Council on Developmental Disabilities</p>
	<p><b>Agency/Group/Organization Type</b></p>	<p>Services-Persons with Disabilities Other government - Local</p>
	<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Homelessness Strategy Non-Homeless Special Needs</p>

	<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>NMHC consulted with the DD Council mainly during the HESG consultation/CoC informational meeting but also stated the need for services for individuals with special needs but are not homeless. The DD Council's mission is to promote systems change to ensure that individuals with developmental disabilities and their families have the same opportunities as others in the community. Many individuals with developmental disabilities struggle in securing sufficient income to gain access to housing. Those who are not categorized as homeless find it difficult with the limited resources in the CNMI. The DD Council extends its best efforts to assist those individuals.</p>
8	<p><b>Agency/Group/Organization</b></p>	<p>Office of the Governor- Office of Vocational Rehabilitation</p>
	<p><b>Agency/Group/Organization Type</b></p>	<p>Services-Persons with Disabilities Services-Employment Other government - Local</p>
	<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy</p>
	<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>NMHC consulted with the OVR Office mainly during the HESG consultation/CoC informational meeting but the Office of the OVR has also played a role in contributing to the anti-poverty strategy portion of the Action Plan. Through its programs, many OVR clients have been able to gain employment with the CNMI government to learn workforce skills. This contributes to the anti-poverty efforts that the CNMI is currently making. The mission of the Office of Vocational Rehabilitation is to increase employment and promote independence among eligible individuals with disabilities throughout the Commonwealth of the Northern Mariana Islands, which are also individuals who both are not homeless but with special needs and some individuals who find themselves at the risk of homelessness.</p>

**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?
Continuum of Care	Northern Marianas Housing Corporation	The CNMI currently does not have a CoC in place; however, we have used other CoCs as a guidance to initiate the implementation of a CoC in the CNMI.
FY 2019-2020 Community Services Block Grant	Department of Community and Cultural Affairs	The goals outlined the CSBG 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.
CNMI Four Year State Plan (2015-2019) on Aging	Department of Community and Cultural Affairs	The goals of the Four Year State Plan (2015-2019) on Aging address the needs of the island's elderly population to include public facilities and improvements, housing, and services to such populations.
2018 CNMI Workforce Innovation and Opportunity Act	Department of Labor-Workforce Investment Agency	The goals outlined in 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.
CDD State Plan for FY 2017-2021	Council on Developmental Disabilities	The goals of the CDD State Plan address the housing and supportive service needs of persons with disabilities.
FY 2017-2021 OVR Unified Plan	Office of Vocational Rehabilitation	The goal outlined in the OVR State Plan is to address the special needs of persons with disabilities who are seeking employment to achieve independence and self-sufficiency.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Family Self-Sufficiency Program Plan	Northern Marianas Housing Corporation	The ultimate objective reflected in the FSS plan is to provide low income families with opportunities such as education, job training and employment, and social support services- needed to achieve some degree of self-sufficiency thus reducing their reliance on Section 8 assistance.
Section 8 Administrative Plan	Northern Marianas Housing Corporation	The HCVP Administrative Plan address the needs of Section 8 and Multi-family units residents. Goals outlined in the HCVP Admin Plan is to provide safe, sanitary, and decent housing to low income families while maintaining their rent at an affordable level and to provide private property owners with the incentive to rent to low income families by offering timely assistance payments.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

## AP-12 Participation – 91.105, 91.200(c)

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

The 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 Action 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, all Annual Action Plans must be made available for a total of 30 days for the public to provide comment. See Appendix A1: Public Notice of Availability of CPD Funds and Notice of Public Hearings on Saipan held on March 15, 2019, Tinian held on March 12, 2019, and Rota held on March 18, 2019; See Appendix A2: Attendance Sheets for Public Hearings on all (3) jurisdictions; See Appendix F: NMHC's Citizen Participation Plan. See Appendix G: Availability of the PY 2019 Annual Action Plan. NMHC met the CPP requirements by conducting HEARING DATES hearings on all three islands). In addition, all public notices met the 30-day comment period and the 15-day notice for all hearings. A Notice for the Public soliciting for comments was published on Tuesday, April 28, 2020, and in the same notice, a notice of scheduled virtual hearings was published. The virtual hearing was held on May 5, 2020 and the public comment period ended on May 6, 2020. The Substantial Amendment was triggered for the following reasons: 1) To amend the NMHC's Citizen Participation Plan and 2) To include additional CDBG and HESG funding made possible through the CARES Act to address the COVID-19 pandemic. As with the second HESG-COVID allocation, NMHC published the Substantial Amendment to the Action Plan on June 23, 2020. Public comment period ended on June 29, 2020 (Please see attached public notice). A public hearing was not required. As with the second CDBG-COVID allocation, NMHC published the Substantial Amendment to the Action Plan on July 10, 2020. Public comment period ended on Monday July 20, 2020 (Please see attached public notice). A public hearing was held on Thursday, July 16, 2020.



**Citizen Participation Outreach**

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

1	Public Hearing	Non-targeted/broad community	<p>A total of (1) individual representing (1) entity (Office of the Governor) attended the public hearing on Saipan. A total of (11) individuals attended the public hearing on Tinian (The individuals represented several agencies some of which were the Office of the Mayor of Tinian, Department of Public Works, Department of Public Safety, etc). A total of (14) individuals attended the public hearing on Rota (The individuals represented several agencies, some of which were the Office of the Mayor</p>	All agreed to the AAP goals and objectives.	No comments received.	
---	----------------	------------------------------	---	---	-----------------------	--

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)
			of Rota, Department of Community and Cultural Affairs, Department of Public Works, the Legislature, etc.). NMHC representatives were present on all three islands.			

2	Internet Outreach	Persons with disabilities	<p>No responses or comments were received. NMHC, mainly used, email communications and phone calls to contact the following agencies: Department of Community and Cultural Affairs, Northern Marianas Protection and Advocacy Systems, Council on Development Disabilities, the Salvation Army, Department of Public Works, the Department of Labor, Office of the Mayors of Tinian and Rota, and Karidat Social Services. NMHC also publicized the PY2019 Annual</p>	All agreed to the AAP goals and objectives.	No comments received.	
---	-------------------	---------------------------	---	---	-----------------------	--


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)
			Action Plan on its website.			
3	Newspaper Ad	Non-targeted/broad community	No comments were received	No comments were received	No comments were received	
4	Virtual Hearings/Newspaper Circulation/Website/Social Media (for Substantial Amendments effective until September 21, 2020)	Non-targeted/broad community	Pending	Pending	Pending	

Table 4 – Citizen Participation Outreach

## Expected Resources

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

#### Introduction

The CDBG, HOME, and ESG annual allocation amounts are based on the PY19 allocation.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services; Emergency Housing Assistance (Mortgage Assistance)	1,809,856	22,000	0	1,831,856	0	The CDBG annual allocation amount is based on the PY19 allocation. In the next program year, CDBG funding will be used towards public facilities/improvements and disaster response and recovery. Of the total CDBG allocation, an additional amount of \$549,270 (first allocation) was allocated to the CNMI through the CARES Act to address the COVID-19 pandemic. An additional \$274,635 (second allocation) will be used for emergency housing assistance (mortgage assistance)



Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	429,574	223,000	0	652,574	0	The HOME allocation amount is based on the PY19 allocation. HOME funds will be used as in the previous years for acquisition, homebuyer assistance and homeowner rehab.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	352,760	0	0	352,760	0	The ESG allocation amount is based on the PY19 allocation. One-hundred percent of ESG funds will be used towards rapid re-housing activities. In the past few years, NMHC has realized that there is a significant demand for rapid-rehousing services in the CNMI, as residents are becoming literally homeless due to the devastation that Super Typhoon Yutu caused to many homes. Planning and Administrative funds are retained at NMHC, as NMHC is administering the program directly. <b>Of the total HESG allocation, an additional amount of \$275,414 was allocated to the CNMI through the CARES Act to address the COVID-19 pandemic and will be used for housing relocation and stabilization services, HMIS, homelessness prevention and rapid re-housing assistance.</b>



Table 5 - Expected Resources – Priority Table

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

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

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

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. Based on a 2017 Department of Public Lands report, 51% of land in the CNMI is publicly -owned. The military does not have permanently stationed military personnel on any islands of the CNMI. The leased lands of Saipan, Tinian, and Farallon de Mendenilla are for training purposes only.

**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. Based on a 2017 Department of Public Lands report, 51% of land in the CNMI is publicly -owned. The military does not have permanently stationed military personnel on any islands of the CNMI. The leased lands of Saipan, Tinian, and Farallon de Mendenilla are for training purposes only.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Disaster Response and Recovery	2015	2019	Non-housing Community Development  Homeless		Non-housing community development  Homelessness	CDBG: \$549,270  HESG: \$275,414	To fund up to (2) public facilities and/or public service activity to address a disaster  To assist up to 40 households with housing relocation and stabilization services and rapid rehousing and homelessness prevention assistance in response to a disaster; To fund HMIS
2	Special Needs, LMI, and ELI Income Housing	2015	2019	Affordable Housing Homeless		Homelessness Affordable Housing	HOME: \$429,574 ESG: \$77,346	Homeowner Housing Added: 2 Household Housing Unit Homeowner Housing Rehabilitated: 2 Household Housing Unit Direct Financial Assistance to Homebuyers: 1 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 6 Households Assisted Other: 1 Other



Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Increase homeowner education and counseling	2015	2019	Affordable Housing	Saipan Tinian Rota	Affordable Housing	HOME: \$429,574	Other: 5 Other
4	Sustain Affordable Housing Stock	2015	2019	Affordable Housing Public Housing Non-Homeless Special Needs	Saipan Tinian Rota	Affordable Housing	HOME: \$429,574	Other: 1 Other
5	Promote Fair Housing	2015	2019	Affordable Housing	Saipan Tinian Rota	Affordable Housing	CDBG: \$192,790 HOME: \$85,915	Other: 1 Other
6	Public Facilities and Improvements	2015	2019	Non-Housing Community Development	Saipan Tinian Rota	Non Housing Community Development	CDBG: \$771,160	Other: 4 Other
7	Public Services	2015	2019	Non-Housing Community Development	Saipan Tinian Rota	Non Housing Community Development	CDBG: \$0	Other: 0 Other
8	Conduct a Point in Time Survey	2015	2019	Homeless	Saipan Tinian Rota	Homelessness	CDBG: \$192,790	Other: 1 Other
9	Family Self-Sufficiency Program	2015	2019	Affordable Housing	Saipan	Affordable Housing	CDBG: \$0	Other: 5 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	Economic Development	2015	2019	Non-Housing Community Development	Saipan Tinian Rota	Non Housing Community Development	CDBG: \$0	Other: 0 Other

Table 6 – Goals Summary

1	<b>Goal Name</b>	Disaster Response and Recovery
	<b>Goal Description</b>	<p>1) To allocate funds for a public service and/or rehabilitation, acquisition, or construction of a public facility that will address a disaster (inclusive of a pandemic)</p> <p>2) To allocate funds to address homelessness during a disaster (inclusive of a pandemic)</p>
2	<b>Goal Name</b>	Special Needs, LMI and ELI Income Housing
	<b>Goal Description</b>	<p>1. Finance the acquisition, construction, or rehabilitation of structures for use as housing for special needs population and low-mod income populations</p> <p>2. Incorporate universal and energy efficiency design elements for affordable housing</p> <p>3. Continue to make decent, safe, sanitary, and housing affordable through the HOME deferred loans and grants for those families that fall within the extremely low-income category</p> <p>4. Promote the availability and accessibility for housing for the special needs population</p> <p>5. Support other financing programs through federal grants, as well as, through private lending institutions that promote the affordability of housing in the CNMI</p> <p>NMHC will use HOME Program funds to rehabilitate (2) units, construct (2) new units, and provide financial assistance to a (1) household to acquire a home. NMHC will use ESG funds to assist a total of (6) households with rapid re-housing and homelessness prevention assistance. These activities meet the special needs and low to moderate income housing goal.</p>



3	<b>Goal Name</b>	Increase homeowner education and counseling
	<b>Goal Description</b>	1. Continue to refine and support any program that enhances homeowner education and counseling for first-time homeowners. The number below represents the number of households expected to receive homeowner education and counseling that will avail of the HOME Program. 3 households for the program year for first time homeowners (new construction and acquisition) and 2 households for the next for homeowners who wish to repair their homes. This amounts to 5 households per year.
4	<b>Goal Name</b>	Promote Fair Housing
	<b>Goal Description</b>	To continuously address barriers to Fair Housing. The Analysis of Impediments was completed in PY 2015. To hold (1) fair housing workshop for tenants, landlords, HOME clients, and the general population per year. The figure below represents the number for the next program year. NMHC plans to hold a fair housing workshop by December 2018. Funds will be used from CPD admin funds. NMHC inputted the total admin funds for the CDBG and HOME program, as the cost to conduct a workshop is undetermined.
5	<b>Goal Name</b>	Sustain affordable housing stock
	<b>Goal Description</b>	2. Support any HUD financing program that sustains the stock of affordable housing in the CNMI. 3. 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 modify to meet ADA standards. Up to two homes will be rehabilitated through the HOME Program for the next program year.

6	<b>Goal Name</b>	Public Facilities and Improvements
	<b>Goal Description</b>	<ol style="list-style-type: none"> <li>1. To acquire, construct, or rehabilitate facilities for low-moderate income communities and special needs population.</li> <li>2. Sports and recreational facilities</li> <li>3. Community Centers</li> <li>4. Facilities that improve services to the general public</li> <li>5. Infrastructure improvements such as road repairs, rehabilitation or installation of street lighting, rehabilitation or construction of water and erosion management projects, rehabilitation or construction of water reservoirs. The CNMI plans to fund up to (4) projects per year (depending on project budget proposal) that meet at least one of the goals above.</li> </ol> <p>The number below represents the number of public facility and improvement projects to be funded annually</p>
7	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	In SP45, Strategic Plan Goals, the CNMI mentioned that it plans to fund (2) public services projects within the next five years. Since there will be no public services projects to be funded next year, the -0- figure below was inputted. Moreover, no funding will go towards public services in the next program year. Because it is part of the Strategic Plan Goals, the goal was included in the Action Plan Goals. Although there will be no public services project next year, NMHC anticipates discussions, in the next program year, with jurisdictions on various public services activities that is needed in Tinian, Rota, and Saipan.
8	<b>Goal Name</b>	Point in Time Survey
	<b>Goal Description</b>	The CNMI aims to re-apply for a COC grant by PY 2019, as indicated in its 2015-2019 Five Year Consolidated Plan. In the last program year, the CNMI conducted the second PIT count survey. Goal was met in PY 2017.
9	<b>Goal Name</b>	Family Self Sufficiency Program
	<b>Goal Description</b>	The number below (5 families per year) represents the # of families aimed to be enrolled in the FSS Program in the next year. The FSS Program is part of the Section 8 Program of NMHC and will not be funded by any of the CPD programs. Therefore, the "funding allocated" section below is left blank.

10	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	The Economic Development Strategic Goal was included in the AP goals for consistency, however, the -0- below is included because the CNMI will not fund ED projects next year but aims to fund (2) ED projects within the next five years, as stated in the SP 45, Strategic Plan Goals. Moreover, no funding will go towards ED projects in the next program year.

**Goal Descriptions**

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

In the table below, you will find the selected projects for Program Year 2018, based on an evaluation conducted by a 8-member committee comprised of (5) NMHC staff and (3) board members, (1) member from Saipan, (1) board member from Tinian, and (1) board member from Rota. Due to a conflict of interest that was brought up by a board member from the island of Rota. The CDBG selection committee met in June 2018. Based on a set criteria, the projects were scored, in order of priority (20% is automatically set-aside for planning and administrative costs). Note that the projects were originally going to be funded with PY 2018 funding; however, such projects were postponed and now reinstated in the next program year. The CNMI has identified the following community development priority needs for the next five years based on input from the community and consultation with other agencies:

#### Public Facilities

- 1) To construct or rehabilitate facilities and purchase equipment (which would be categorized as a public facility) that will improve services to the general public. **Disaster Response (priority): To construct, rehabilitate, or acquire facilities and purchase equipment that will address priority needs of a low-mod income population during a disaster (inclusive of a pandemic)**
- 2) To construct or rehabilitate recreational and sports facilities.



#### Infrastructure Upgrades/Public Improvements

- 3) To develop or improve infrastructure projects such as: specifically to develop or improve infrastructure upgrades 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, etc.)

#### Public Services

- 4) To allocate funding to eligible public services activities such as, but not limited to, job training, child care, health care, and other eligible public services activities. **Disaster Response (priority): To allocate funding to a public service activity that will address the immediate needs of the low-mod**



income population during a disaster (inclusive of a pandemic)

### Economic Development

5) To allocate funding to projects that will stimulate the economy and/or to increase economic efficiency.

### Projects

#	Project Name
1	Rehabilitation of the Tinian Gymnasium Basketball Court (Cancelled)
2	Rehabilitation of the Rota Youth Center (Cancelled)
3	Rehabilitation of the Tanapag Youth Center
4	Rehabilitation of the Sinapalo Children's Park Roof (Cancelled)
5	PY CDBG 2019 Planning and Administrative Costs
6	Purchase and Installation of Modular/Pre-fabricated Units for Transitional Housing (Saipan) (New)
7	Acquisition of a Mobile Clinic for the Commonwealth Health Care Corporation (CHCC) (New)
8	HOME Investment Partnership Grant (Direct Homeownership Assistance)
9	HOME Investment Partnership (Homeowner Rehabilitation)
	PY 2019 HOME Planning and Administrative Costs
9	HESG19 Northern Marianas Housing Corporation
10	Commonwealth Office of Transit Authority Bus Shelters (Alternate Project 1)
11	Kagman Community Park Phase II (Alternate Project 2)

Table 7 - Project Information

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

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-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 maximum impact will be.

**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 400+ 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**

**Note: For detailed description of the NEW projects above, please refer to the end of the table below:**



1	<b>Project Name</b>	Rehabilitation of the Tinian Gymnasium Basketball Court (Cancelled)
	<b>Target Area</b>	Tinian
	<b>Goals Supported</b>	Public Facilities and Improvements
	<b>Needs Addressed</b>	Non Housing Community Development
	<b>Funding</b>	CDBG: \$86,250
	<b>Description</b>	The Office of the Mayor of Tinian submitted a proposal for the rehabilitation of the Tinian Gymnasium Basketball Court. The Gymnasium is the most widely used public facility and is the only indoor sports facility on the island of Tinian. Due to the basketball courts dilapidating conditions, a rehabilitation of the court is absolutely necessary to avoid safety hazards. These activities are eligible under 24 CFR Part 570.201(c). CDBG Funded Amount: \$86250. The project will serve the entire island of Tinian.
	<b>Target Date</b>	11/1/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project's immediate service area is the island of Tinian and is located in San Jose Village, Tinian. Census Tracts: 9501.01, Block groups: 1-3; 9501.02, Block Group 1; and 9502.00, Block Groups 1-2, with a total population of 2,802, of which 2,367 or 84.5% are low-mod income. The Gymnasium serves approximately 25+ people daily. The national objective met for this project is area benefit, 24 CFR Part 570.208(a)(1)(i). The total population of the immediate service area is the number reflected in the goal outcome indicator.
	<b>Location Description</b>	San Jose Village, Tinian
<b>Planned Activities</b>	The planned activities are the following: removal and replacement of the basketball court flooring.	
2	<b>Project Name</b>	Rehabilitation of the Rota Youth Center (Cancelled)
	<b>Target Area</b>	Rota
	<b>Goals Supported</b>	Public Facilities and Improvements
	<b>Needs Addressed</b>	Non Housing Community Development
	<b>Funding</b>	CDBG: \$200,000



	<b>Description</b>	The Department of Community and Cultural Affairs submitted a proposal for CDBG funds for the rehabilitation of the Rota Youth Center. The RYC provides after school programs for the children and youth of Rota and adult programs such as parenting classes. The attendees are increasing in size and in order to provide a safe and decent facility for the Rota residents, the Division of Youth Services believes that the rehabilitation will provide a will enable the extension of current programs for the extremely underserved children and youth and the adults. The facility is also used as a community and recreational center. The island is in need of a complete rehabilitation of the RYC, a center that will enhance community involvement and expand programs and training for adults, children, and youth alike. The project meets Goal #5- To construct or rehabilitate public facilities, including recreational and community center facilities that will benefit the residents of Rota. These activities are eligible under 24 CFR Part 570.201(c). CDBG funded amount: \$200,000
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project's immediate service area is the island of Rota and is located in Sinapalo Village, Rota. Census Tract: 9501.01, Block groups: 1-3, with a total population of 2,444, of which 2,076 or 84.9% are low-mod income. The national objective met for this project is area benefit, 24 CFR Part 570.208(a)(1)(i). The total population of the immediate service area is the number reflected in the goal outcome indicator.
	<b>Location Description</b>	SongSong Village, Rota
	<b>Planned Activities</b>	Please see Appendix H of the AAP for the detailed scope of work.
<b>3</b>	<b>Project Name</b>	Rehabilitation of the Tanapag Youth Center
	<b>Target Area</b>	Saipan
	<b>Goals Supported</b>	Public Facilities and Improvements
	<b>Needs Addressed</b>	Non Housing Community Development
	<b>Funding</b>	CDBG: \$200,000

	<b>Description</b>	The Department of Community and Cultural Affairs submitted a proposal for CDBG funds for the rehabilitation of the Tanapag Youth Center. The TYC provides after school programs for the children and youth and also exclusively provides Botvin Life Skills Program for middle and high school students and a substance abuse prevention curriculum for youth. The center also serves as a community center for adults, when adult programs/events take place. The village is in need of a complete rehabilitation of the TYC, a center that will enhance community involvement and expand programs and training for adults, children, and youth alike. The project meets Goal #5- To construct or rehabilitate public facilities, including recreational and community center facilities that will benefit the residents of Rota. These activities are eligible under 24 CFR Part 570.201(c). CDBG funded amount: \$200,000
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project's immediate service area is the island of Saipan and is located in the village of Tanapag, Saipan. Census Tract: 2, Block groups: 1-2, with a total population of 1,453, of which 1,213 or 83.5% are low-mod income. The national objective met for this project is area benefit, 24 CFR Part 570.208(a)(1)(i). The total population of the immediate service area is the number reflected in the goal outcome indicator.
	<b>Location Description</b>	Tanapag, Saipan
	<b>Planned Activities</b>	Please see Appendix H in the AAP for detailed scope of work.
<b>4</b>	<b>Project Name</b>	Rehabilitation of the Sinapalo Children's Park Roof (Cancelled)
	<b>Target Area</b>	Rota
	<b>Goals Supported</b>	Public Facilities and Improvements
	<b>Needs Addressed</b>	Non Housing Community Development
	<b>Funding</b>	CDBG: \$306,911



	<b>Description</b>	The Office of Grants Management submitted a proposal for CDBG funds for the rehabilitation of the Sinapalo Children Park Roof. The Sinapalo Childrens Park features a stage area with seating for about 200 people; however, there is no adequate lighting system or covering to protect patrons from natural elements. The rehabilitation of the roof will provide a more comfortable area where the community can gather. The project meets Goal #5- To construct or rehabilitate public facilities, including recreational and community center facilities that will benefit the residents of Rota. These activities are eligible under 24 CFR Part 570.201(c). CDBG funded amount: \$284,910.80(PY 2019 allocation) + \$22,000(PY 2019 CDBG PI) = \$306,910.80.
	<b>Target Date</b>	4/1/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project's immediate service area is the island of Rota and is located in Sinapalo Village, Rota. Census Tract: 9501.01, Block groups: 1-3, with a total population of 2,444, of which 2,076 or 84.9% are low-mod income. The national objective met for this project is area benefit, 24 CFR Part 570.208(a)(1)(i). The total population of the immediate service area is the number reflected in the goal outcome indicator.
	<b>Location Description</b>	Sinapalo Village, Rota
	<b>Planned Activities</b>	Metal and electrical work <b>on</b> the roof, including columns, beams, electrical lighting and panel boards, waterproofing on roof, and painting
<b>5</b>	<b>Project Name</b>	PY CDBG 2019 Planning and Administrative Costs
	<b>Target Area</b>	Saipan Tinian Rota
	<b>Goals Supported</b>	Special Needs,LMI, and ELI Income Housing Promote Fair Housing Public Facilities and Improvements Public Services Conduct a Point in Time Survey Economic Development
	<b>Needs Addressed</b>	Non Housing Community Development
	<b>Funding</b>	CDBG: \$192,790 <b>Additional Funding (COVID-19): \$27,463.50</b>



	<b>Description</b>	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: \$192,790.20; Eligible activity under 24 CFR570.206(a)(1);
	<b>Target Date</b>	9/30/2020 <span style="color: red;">COVID-19 Funding Target Date: May 2020</span>
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	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
	<b>Location Description</b>	Saipan, Tinian, and Rota (CNMI jurisdiction), of which approximately 85% of the total population are low-mod income
	<b>Planned Activities</b>	CDBG planning and admin activities
6	<b>Project Name</b>	HOME Investment Partnership Grant (Direct Homeownership Assistance)
	<b>Target Area</b>	Saipan Tinian Rota
	<b>Goals Supported</b>	Special Needs,LMI, and ELI Income Housing Increase homeowner education and counseling Promote Fair Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$285,310



	<b>Description</b>	The HOME Program will provide direct homeownership assistance to qualified first -time homebuyers- new construction of homes or home acquisition. Loans will be provided to up to (3) households for new construction and up to (2) household for acquisition. PI will be used towards this activity as well Units are scattered within the CNMI. HOME eligibility for new construction/rehabilitation/administrative costs citation: 92.205(a)(1); HOME funded amount: \$171,510 (PY18 Allocation) + \$80,350 (PI) = \$251,860 Project meets goal #1- to provide affordable housing to special needs and the low-mod income population.
	<b>Target Date</b>	10/31/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The number of households to be assisted with direct homeownership assistance is (3) households every year, depending on the HOME allocation on an annual basis.
	<b>Location Description</b>	No specific addresses- scattered lots within the CNMI
	<b>Planned Activities</b>	To provide loan or grant assistance to eligible households to build a new home or acquire a home through the HOME Program.
7	<b>Project Name</b>	HOME Investment Partnership (Homeowner Rehabilitation)
	<b>Target Area</b>	Saipan Tinian Rota
	<b>Goals Supported</b>	Special Needs,LMI, and ELI Income Housing Increase homeowner education and counseling Promote Fair Housing Sustain Affordable Housing Stock
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$269,477

	<b>Description</b>	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: \$193,627.90.90 (PY 2019 allocation) + \$109,200 (PI) = \$302,827.90. Project meets goal #4- To sustain the affordable housing stock
	<b>Target Date</b>	10/31/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	To assist up to 2 households every year with homeowner rehab assistance.
	<b>Location Description</b>	No specific addresses. Serves CNMI-wide- Saipan, Tinian, and Rota scattered lots
	<b>Planned Activities</b>	To provide loan or grant assistance to eligible households to rehabilitate their homes through the HOME program.
8	<b>Project Name</b>	PY 2019 HOME Planning and Administrative Costs
	<b>Target Area</b>	Saipan Tinian Rota
	<b>Goals Supported</b>	Special Needs, LMI, and ELI Income Housing Increase homeowner education and counseling Sustain Affordable Housing Stock
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$97,886
	<b>Description</b>	HOME Planning and administrative costs for PY 2018; 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: \$97,886.10 (15% of PY 2019 Allocation, \$64,436.10 + \$33,450 (15% of expected HOME PI)= \$97,886.10; Eligible activity under 24 CFR 92.207(a)(1)
	<b>Target Date</b>	5/31/2020

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The figure below represents the estimated number of households (new construction, rehab, and acquisition) that will be assisted through the HOME Program. As such, admin costs will be incurred in planning for HOME projects (approximately 5 households every year).
	<b>Location Description</b>	CNMI wide- Admin funds will be maintained at the NMHC Central Office in Garapan, Saipan
	<b>Planned Activities</b>	HOME administrative and planning activities
9	<b>Project Name</b>	HESG19 Northern Marianas Housing Corporation
	<b>Target Area</b>	Saipan
	<b>Goals Supported</b>	Special Needs,LMI, and ELI Income Housing
	<b>Needs Addressed</b>	Homelessness
	<b>Funding</b>	ESG: \$77,346 <b>Additional Funding (COVID-19): \$275,414 (First Allocation); \$815,225 (Second Allocation)</b>
	<b>Description</b>	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. If the need arises and there is a residual balance, assistance will be given to at risk of homelessness households (homelessness prevention). In order for the households to be assisted, planning and admin costs will be incurred. Allocation breakdown is as follows: \$21,606 (housing relocation and stabilization services); \$8,000 (HMIS); Planning and Admin- \$5,800 (allocated to NMHC); \$41,940 (rapid re-housing assistance. The total allocation breakdown equates to \$77,346 (ESG funded amount. Project meets goal #1- To provide housing assistance to special needs and low-mod income clientele. Eligibility Citation: 24 CFR 576.106,107,108. See NMHC HESG Budget, Appendix E in the Annual Action Plan . <b>Update: ESG-COVID Allocation breakdown is as follows: \$8,000 (HMIS); Planning and Admin- \$109,063.90 (allocated to NMHC); \$ 389,430.04- rapid re-housing assistance; \$584,145.06 - homelessness prevention. The total allocation breakdown equates to \$1,090,639 (ESG -COVID funded amount. Project meets goal #1- To provide housing assistance to special needs and low-mod income clientele. Eligibility Citation: 24 CFR 576.106,107,108</b>
<b>Target Date</b>	12/31/2020 <b>COVID-19 Target Date: July 31, 2022</b>	



	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The number of families to benefit from the proposed activities will be (6) families.
	<b>Location Description</b>	Assistance will be provided to families who qualify for HESG. 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 is located in Garapan, Saipan.
	<b>Planned Activities</b>	To provide rapid re housing services with includes 10 months rental assistance, security deposit and utility deposit, and 10 months' utility allowance for households who are qualified for HESG assistance.
<b>10</b>	<b>Project Name</b>	Commonwealth Office of Transit Authority Bus Shelters (Alternate Project 1)
	<b>Target Area</b>	Saipan
	<b>Goals Supported</b>	Public Facilities and Improvements
	<b>Needs Addressed</b>	Non Housing Community Development
	<b>Funding</b>	CDBG: \$177,500
	<b>Description</b>	The Commonwealth Office of Transit Authority submitted a proposal for the acquisition and installation of pre-fabricated solar bus shelters. 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). The activity is eligible under 24CFR Part 570.201(c). 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
	<b>Target Date</b>	2/1/0021

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	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. The national objective met for this project is 24CFR part 570.208(a)(1)(i).
	<b>Location Description</b>	Gualo Rai, Saipan; Garapan, Saipan
	<b>Planned Activities</b>	Acquisition of pre-fabricated bus shelters, installation of the bus shelters, installation of solar units (including inverters, battery storage, and accessories)
<b>11</b>	<b>Project Name</b>	Kagman Community Park Phase II (Alternate Project 2)
	<b>Target Area</b>	Saipan
	<b>Goals Supported</b>	Public Facilities and Improvements
	<b>Needs Addressed</b>	Non Housing Community Development
	<b>Funding</b>	CDBG: \$245,000
	<b>Description</b>	The Rotary Club of Saipan submitted a proposal for the Kagman Community Park Phase II. 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. The activity is eligible under 24CFR Part 570.201(c). 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
	<b>Target Date</b>	3/30/0021

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	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 national objective met for this project is area benefit, 24 CFR Part 570.208(a)(1)(i). The total population of the immediate service area is the number reflected in the goal outcome indicator.
	<b>Location Description</b>	Kagman, Saipan
	<b>Planned Activities</b>	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.
NEW	<b>Project Name</b>	<b>Purchase and Installation of Modular/Pre-fabricated Units for Transitional Housing (Saipan) (New)</b> <i>Note: Funds were reprogrammed from "Cancelled" projects above</i>
	<b>Target Area</b>	Saipan
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Non-Housing Community Development
	<b>Funding</b>	\$571,160.80
	<b>Description</b>	The NMHC has proposed to construct a total of up to (6) modular/prefabricated units to be used as transitional housing on the island of Saipan. The transitional housing will be used as temporary housing in the times of disaster and/or for eligible families who qualify under HESG. The project meets Goal #5- To construct or rehabilitate public facilities, including recreational and community center facilities that will benefit the residents of Rota. These activities are eligible under 24 CFR Part 570.201(c). CDBG funded amount: \$571,160.80
	<b>Target Date</b>	October 2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project's location is in Koblerville, Saipan where the population is 2,793, of which 3,219 or 86.6% are low-mod income. The Transitional Housing project will serve eligible families, and up to (6) families yearly (depending on their length of stay). The national objective met for this project is area benefit, 24 CFR Part 570.208(a)(1)(i). The total population of the estimated families to be housed is the number reflected in the goal outcome indicator.



	<b>Location Description</b>	Koblerville, Saipan
	<b>Planned Activities</b>	To purchase a total of up to (6) modular/prefabricated units to be used as Transitional Housing on the island of Saipan
New	<b>Project Name</b>	Purchase of a Mobile Clinic for the Commonwealth Health Care Corporation
	<b>Target Area</b>	Saipan Wide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Non-Housing Community Development
	<b>Funding</b>	\$ 521, 806.50
	<b>Description</b>	The Commonwealth Healthcare Corporation submitted a proposal for the acquisition of a mobile clinic for the island of Saipan. The mobile clinic will be set up at a revolving list of locations to complement traditional care settings to the high risk population. During times of emergency response, the CHCC Mobile Clinic may be activated to meet needs specific to the incident, such as primary and urgent care in the field, resource distribution, and serving as a testing and isolated treatment site during disease outbreaks. The activity is eligible under 24CFR Part 570.201(e). The project meets goal #7- to allocate funds for public services CDBG funded amount: \$571,160.80
	<b>Target Date</b>	October 2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project will serve the Saipan population of 47,644 of which 40,113 or 84.2% are low-mod income. The actual number of clients served by the project will be collected by the Subrecipient.
	<b>Location Description</b>	Saipan-wide. Mobile clinic will have the capability to travel to various villages to provide health services to the at-risk, low income population. Client information will be collected at intake.
<b>Planned Activities</b>	The purchase of a mobile clinic for the Commonwealth Healthcare Corporation (Saipan)	



## 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

The CPD entitlement grants will be allocated to the islands of Saipan, Tinian, and Rota. CDBG: Target areas are the islands of Saipan and Tinian, as the CDBG selection committee, based on a criteria, selected two projects located on these islands. 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". Note: The total allocation exceeds 100% as PY 2019 grant funding will not be sufficient to cover the entire budget proposal for the Sinapalo Children's Park Rehabilitation of the Roof located in the island of Rota. If the plan is approved, NMHC will reprogram residual funding and possibly administrative funds to the project.

### Geographic Distribution

Target Area	Percentage of Funds
Saipan	12
Tinian	26
Rota	62

Table 8 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

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. Particularly for the HTF Program, the funds will be allocated to the island of Saipan, as there is a dire need for affordable rental

housing in the CNMI. For the next program year, a total of two projects, selected by the CDBG selection committee are located on the islands of Saipan and Tinian. No projects will be funded on Rota for the next program year. The percentage of funds reflected above is a percentage of the total 80% of the CDBG allocation (for project costs). 20% or \$196,969, is allocated for planning and admin expenses.

## **Discussion**

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

None.

One Year Goals for the Number of Households to be Supported	
Homeless	6
Non-Homeless	8
Special-Needs	0
Total	14

Table 9 - 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	4
Rehab of Existing Units	2
Acquisition of Existing Units	2
Total	14

Table 10 - One Year Goals for Affordable Housing by Support Type

#### Discussion

None.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

None.

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

1. Explore opportunities to leverage funds to create additional housing opportunities; Seek additional rental vouchers;
2. Increase leasing-up activities;
3. Maintain high occupancy rates by decreasing the number of vacant units; Continue renovation and modernization efforts for all existing units; Increase enforcement efforts;
4. Promote self-sufficiency and asset development of assisted household; Ensure equal opportunity for all persons in need of housing assistance; and
5. Achieve a HUD “high performer” rating under the Section 8 Management Assessment Program (SEMAP)
6. 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”.

### **Discussion**

None.

## **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 2017, 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 HPRP program, a total of 1,500 households were made eligible for either rapid re-housing or homeless prevention assistance. However, there continues to be a significant demand for housing assistance due to the 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 500 households on the waiting list, and about 60+ persons in those households with a disability.

### **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 2019) 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**

All the actions above also addresses this section

**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 also addresses 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 also addresses this section.

## **Discussion**

A table which reflects the one year goals for the number of households to be provided housing through the use of HOPWA is not reflected in the IDIS system but in the AP 2017 downloaded document from IDIS. To elaborate on such table, 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, the Karidat's Social Services 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:**

The barriers identified in the most recent NMHC's Analysis of Impediments were the following: minimum wage and employment, Limited Funding for Housing Programs, and Challenges faced by persons with disabilities. As with the minimum wage, NMHC has no control over the minimum wage. Despite the low minimum wage, NMHC will continue assisting clients based on their eligibility to avail of the programs. The NMHC is committed in ensuring that the needs of the low, very low, and extremely low income household are being addressed. NMHC has implemented the Family Self Sufficiency (FSS) program to work with various organizations in the community to assist clients in obtaining sustainable housing and employment. With the implementation of the FSS program, NMHC is hoping that the number of households on the waiting will be reduced. Limited Funding for Housing Programs- The Mortgage and Credit Division is committed in providing affordable loans to clients who are first time homeowners, clients who are physically challenged, and assisting clients with rehabilitation of their homes. The Emergency Solutions Grant program will continue to serve people who are literally homeless and are at risk of being homeless. Due to limited funding from the grantor agency we are able to assist a small number of families. Despite the limited funding, NMHC and Karidat will continue to address and find solutions for the families who are literally homeless and are at risk. NMHC in collaboration with Karidat social services will monitor and conduct quarterly evaluation to clients who have joined the program and assist the clients in continued housing stability after the program. Challenges Faced by Persons with Disabilities- NMHC will continue assisting persons with disability in a manner that will be consistent with NMHC and HUD policies and procedures. Persons with disability are required to inform their case worker of their conditions in order for NMHC to conduct home visitation for those who have no transportation or bed-ridden. NMHC will explore avenues in providing application for persons that are visually impaired. NMHC has been vigilant in explaining to clients the program requirements and procedures. NMHC is currently working on reducing the waiting list for the Section 8 programs. Clients are required to update their status with the housing specialist from time to time to ensure that accommodations to persons with disabilities are accommodated in a timely and efficient manner. NMHC is committed to ensuring that persons with disabilities are accommodated. NMHC has been enforcing the Fair Housing Act of 1998 since its inception. If for any reason a client feels that the Fair Housing Act of 1998 is not enforced we recommend that they report the matter to their respective NMHC Office or send their complaints to the Corporate Director.

### **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**

In order to ameliorate the negative effects of public policies that serve as barriers, NMHC plans to: work proactively and collaboratively with the Office of Vocational Rehabilitation and Council on Developmental Disabilities to provide accommodations for those who are visually impaired and for

those who lack transportation, NMHC is currently in discussions with the Commonwealth of Transit Authority (COTA) about the expansion of their vehicle routing services, most especially to individuals with disabilities, who are also being served in the HUD-assisted programs. As with limited funding for housing programs, NMHC will continue to explore funding opportunities for housing assistance, as the demand for housing is greater than ever (especially after the disaster caused by Typhoon Soudelor). Karidat Social Services, NMHC's ESG Subgrantee, is the only other agency which provides monthly housing vouchers through a federal program. As mentioned above, NMHC has no control over the CNMI's minimum wage.

**Discussion:**

None.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

Obstacles to meeting underserved needs are funding 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 economic development projects are funded 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 construct up to (2) new homes, rehabilitate up to (2) new homes, and based on eligibility, enable a low-moderate income household to acquire (1) home in the next program year.

### **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 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 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 Typhoon Soudelor in August 2015 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**

#### **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.

#### **Discussion:**

With regards to economic development, the NMHC has recently been involved in the Special Economic Development Commission established by the Lt. Governor of the CNMI, Ralph Torres. Members from the private sector, social service agencies, and the government have been tasked to take part of the discussions to enhance economic development in the CNMI and to improve services in the agencies involved so clients are being served effectively. Discussions have started in early November and will

continue through the new program year. Planned actions in the next year include:

- 1) Enhance coordination with the Rotary Club and Chamber of Commerce to identify CNMI businesses who are willing to take part in various social service programs administered by local and non-profit agencies and have them assist in terms of funding the programs, more specifically programs that will provide training and education for individuals who choose to start up a small business
- 2) Enhance coordination with the Commonwealth Development Authority and provide resources to individuals who wish to borrow a micro-loan to start a small business
- 3) Through the FSS Program, provide those enrolled with the program the resources that will enable them to gain employment (whether it's through businesses directly or the Workforce Investment Agency Program), since the economy is expected to boost in the next few years with the growing hotel and gaming industries.

In addition, 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, the Karidat's Social Services 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.

## Program Specific Requirements

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

#### Introduction:

None.

#### 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:

Foreclosure and Recapture. If the HOME assisted property is subject to recapture terms, 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. NMHC may use non-HOME funds to acquire the property.

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:

All subsidy amounts (in the form of loans) that directly benefited the property owner (i.e., through down payment and/or closing cost assistance, deferred payment loans, interest rate buy-downs, property discount, etc.) are also subject to recapture. Recapture is capped at what is available out of net proceeds. Net proceeds are defined as the sales price less superior non HOME debt (if any)

less closing costs. NMHC will utilize the following recapture options:

1. **Recapture entire amount-** NMHC may recapture the entire amount of the loan and/or subsidy from the homebuyer(s) if the sale of the property occurs within halfway into the given affordability period.
  2. **Forgiveness-** NMHC may reduce the loan amount and/or subsidy to be recaptured on a pro rata basis for the period the homebuyer(s) has/have owned and occupied the housing unit measured against the required affordability period.
  3. **Buyer's recovery of initial investment-** The homebuyer(s) investment (down payment and capital improvements made by the owner since purchase) may be repaid in full before any HOME funds are recaptured and conditional with certain provisions.
  4. **Shared appreciation-** In the case where net proceeds exceed the amount necessary to repay both the homebuyer(s)' investment and the HOME assistance, the excess proceeds may be shared proportionately (i.e., percentage of investment provided) by both parties.
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.

For detailed information on the HOME Program and Policies (2015), please see Appendix J and Appendix J-1 Revisions made to HOME Program Policies and Procedures.

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

1. Include written standards for providing ESG assistance (may include as attachment)  
  
See Appendix E: written standards for ESG
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 currently does not have a Continuum of Care program in place.

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

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 (9) members ((3) of which are Board of Directors from each jurisdiction) select a proposal based on the following:

- 1) The applicant's history of providing effective shelter or prevention services to the homeless, and of successfully operating performance based grant-funded programs
  - 2) 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
  - 3) 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 consulting 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 the ESG. The following factors are considered in selecting a homeless or formerly homeless individual 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 households (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.

None.


## Attachments

Grantee SF-424's and Certification(s)

OMB Number: 4040-0004  
Expiration Date: 12/31/2019


Application for Federal Assistance SF-424		
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
<b>* 3. Date Received:</b> <input type="text"/>	<b>4. Applicant Identifier:</b> <input type="text"/>	
<b>5a. Federal Entity Identifier:</b> <input type="text"/>	<b>5b. Federal Award Identifier:</b> <input type="text"/>	
<b>State Use Only:</b>		
<b>6. Date Received by State:</b> <input type="text"/>	<b>7. State Application Identifier:</b> <input type="text"/>	
<b>B. APPLICANT INFORMATION:</b>		
<b>* a. Legal Name:</b> Commonwealth of the Northern Mariana Islands		
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 68-019463	<b>* c. Organizational DUNS:</b> 854856270030	
<b>d. Address:</b>		
<b>* Street1:</b> Callier Box 10807	<input type="text"/>	
<b>Street2:</b>	<input type="text"/>	
<b>* City:</b> Saipan	<input type="text"/>	
<b>County/Parish:</b>	<input type="text"/>	
<b>* State:</b> MP: Northern Mariana Islands	<input type="text"/>	
<b>Province:</b>	<input type="text"/>	
<b>* Country:</b> USA: UNITED STATES	<input type="text"/>	
<b>* Zip / Postal Code:</b> 96950-0514	<input type="text"/>	
<b>e. Organizational Unit:</b>		
<b>Department Name:</b> Northern Marianas Housing Corp	<b>Division Name:</b> <input type="text"/>	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
<b>Prefix:</b> MR.	<b>* First Name:</b> Tease	
<b>Middle Name:</b> S.	<input type="text"/>	
<b>* Last Name:</b> Palacios	<input type="text"/>	
<b>Suffix:</b>	<input type="text"/>	
<b>Title:</b> Corporate Director		
<b>Organizational Affiliation:</b> n/a		
<b>* Telephone Number:</b> 670-234-6866	<b>Fax Number:</b> 670-234-9021	
<b>* Email:</b> spalacios@nmhc.gov.mp		

Application for Federal Assistance SF-424	
<p><b>* 9. Type of Applicant 1: Select Applicant Type:</b></p> <p>U.S. Territory or Possession</p> <p>Type of Applicant 2: Select Applicant Type:</p> <p>Type of Applicant 3: Select Applicant Type:</p> <p>* Other (specify):</p>	
<p><b>* 10. Name of Federal Agency:</b></p> <p>U.S. Department of Housing and Urban Development</p>	
<p><b>11. Catalog of Federal Domestic Assistance Number:</b></p> <p>14.218</p> <p>CFDA Title:</p> <p>Community Development Block Grant</p>	
<p><b>* 12. Funding Opportunity Number:</b></p> <p>n/a</p> <p>* Title:</p> <p>n/a</p>	
<p><b>13. Competition Identification Number:</b></p> <p>n/a</p> <p>Title:</p> <p>n/a</p>	
<p><b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b></p> <p>See Attachment</p> <p>Add Attachment Delete Attachment View Attachment</p>	
<p><b>* 15. Descriptive Title of Applicant's Project:</b></p> <p>Rehabilitation of the following projects: Tinian Gym Basketball Court, Sinapalo Children's Park, Rota Youth Center, Tanapag Youth Center, CDBG Admin: See attachment for Alternate Projects</p>	
<p>Attach supporting documents as specified in agency instructions.</p> <p>Add Attachments Delete Attachments View Attachments</p>	

Application for Federal Assistance SF-424	
<b>16. Congressional Districts Of:</b>	
* a. Applicant: <input type="text" value="CNNI"/>	* b. Program/Project: <input type="text" value="CISC"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
<b>17. Proposed Project:</b>	
* a. Start Date: <input type="text" value="01/03/20"/>	* b. End Date: <input type="text" value="01/03/21"/>
<b>18. Estimated Funding (\$):</b>	
* a. Federal	<input type="text" value="960,901.00"/>
* b. Applicant	<input type="text" value="0"/>
* c. State	<input type="text" value="0"/>
* d. Local	<input type="text" value="0"/>
* e. Other	<input type="text" value="0"/>
* f. Program Income	<input type="text" value="22,000.00"/>
* g. TOTAL	<input type="text" value="982,901.00"/>
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b>	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> .	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)</b>	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
21. "By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
<b>Authorized Representative:</b>	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Arnold"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Palacios"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Acting Governor"/>	
* Telephone Number: <input type="text" value="870-237-2200"/>	Fax Number: <input type="text"/>
* Email: <input type="text" value="arnoldpalacios.lt.gov@gmail.com"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="AUG 08 2019"/>

Application for Federal Assistance SF-424		
* 1. Type of Submission:	* 2. Type of Application:	* F Revision, select appropriate letter(s):
<input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	<input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	<input type="text" value=""/> <input type="text" value=""/>
* 3. Date Received:	4. Applicant Identifier:	
<input type="text" value=""/>	<input type="text" value=""/>	
5a. Federal Entity Identifier:	5b. Federal Award Identifier:	
<input type="text" value=""/>	<input type="text" value=""/>	
State Use Only:		
6. Date Received by State:	7. State Application Identifier:	
<input type="text" value=""/>	<input type="text" value=""/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="Commonwealth of the Northern Mariana Islands"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN):	* c. Organizational DUNS:	
<input type="text" value="98-019669"/>	<input type="text" value="8548562770000"/>	
d. Address:		
* Street1:	<input type="text" value="Callar Box 18007"/>	
Street2:	<input type="text" value=""/>	
* City:	<input type="text" value="Saipan"/>	
County/Parish:	<input type="text" value=""/>	
* State:	<input type="text" value="MP: Northern Mariana Islands"/>	
Province:	<input type="text" value=""/>	
* Country:	<input type="text" value="USA: UNITED STATES"/>	
* Zip / Postal Code:	<input type="text" value="96950-0514"/>	
e. Organizational Unit:		
Department Name:	Division Name:	
<input type="text" value="Northern Mariana Easing Corp"/>	<input type="text" value=""/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix:	<input type="text" value="Mr."/>	* First Name:
Middle Name:	<input type="text" value="B."/>	<input type="text" value="Jesica"/>
* Last Name:	<input type="text" value="Palacios"/>	
Suffix:	<input type="text" value=""/>	
Title:	<input type="text" value="Corporate Director"/>	
Organizational Affiliation:		
<input type="text" value="n/a"/>		
* Telephone Number:	<input type="text" value="670-234-8866"/>	Fax Number:
		<input type="text" value="670-234-9021"/>
* Email:	<input type="text" value="jpalacios@nraho.gov.mp"/>	

Application for Federal Assistance SF-424	
<p>* 9. Type of Applicant 1: Select Applicant Type:</p> <p>U.S. Territory or Possession</p> <p>Type of Applicant 2: Select Applicant Type:</p> <p>Type of Applicant 3: Select Applicant Type:</p> <p>* Other (specify):</p>	
<p>* 10. Name of Federal Agency:</p> <p>U.S. Department of Housing and Urban Development</p>	
<p>11. Catalog of Federal Domestic Assistance Number:</p> <p>14.239</p> <p>CFDA Title:</p> <p>Home Investment Partnership Program</p>	
<p>* 12. Funding Opportunity Number:</p> <p>n/a</p> <p>* Title:</p> <p>n/a</p>	
<p>13. Competition Identification Number:</p> <p>n/a</p> <p>Title:</p> <p>n/a</p>	
<p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <p>See Attachment.</p> <p>Add Attachment   Delete Attachment   View Attachment</p>	
<p>* 15. Descriptive Title of Applicant's Project:</p> <p>BY 2019 HOME Planning and Admin costs/ HOME new construction and acquisition, HOME rehabilitation</p>	
<p>Attach supporting documents as specified in agency instructions.</p> <p>Add Attachments   Delete Attachments   View Attachments</p>	

Application for Federal Assistance SF-424	
<b>16. Congressional Districts Of:</b>	
* a. Applicant: <input type="text" value="CRMI"/>	* b. Program/Project: <input type="text" value="CDBG"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
<b>17. Proposed Project:</b>	
* a. Start Date: <input type="text" value="01/03/20"/>	* b. End Date: <input type="text" value="01/03/21"/>
<b>18. Estimated Funding (\$):</b>	
* a. Federal	<input type="text" value="429,574"/>
* b. Applicant	<input type="text" value="0"/>
* c. State	<input type="text" value="0"/>
* d. Local	<input type="text" value="0"/>
* e. Other	<input type="text" value="0"/>
* f. Program Income	<input type="text" value="223,000"/>
* g. TOTAL	<input type="text" value="652,574.00"/>
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b>	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> .	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)</b>	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
<b>21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)</b>	
<input checked="" type="checkbox"/> <b>"I AGREE"</b>	
<small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
<b>Authorized Representative:</b>	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Arnold"/>
Middle Name: <input type="text" value=""/>	
* Last Name: <input type="text" value="Pelaez"/>	
Suffix: <input type="text" value=""/>	
* Title: <input type="text" value="Acting Governor"/>	
* Telephone Number: <input type="text" value="679-237-2200"/>	Fax Number: <input type="text" value=""/>
* Email: <input type="text" value="arnold@pelaez.lt.gov@gmail.com"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="AUG 08 2019"/>

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
<b>State Use Only:</b>		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>		
* a. Legal Name: <input type="text" value="Commonwealth of the Northern Mariana Islands"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="98-019463"/>	* c. Organizational DUNS: <input type="text" value="854856271000"/>	
<b>d. Address:</b>		
* Street1: <input type="text" value="Callar Box 10307"/>	Street2: <input type="text"/>	
* City: <input type="text" value="Saipan"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="NP: Northern Mariana Islands"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="96950-0514"/>	
<b>e. Organizational Unit:</b>		
Department Name: <input type="text" value="Northern Mariana Housing Corp"/>	Division Name: <input type="text"/>	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
Prefix: <input type="text" value="MR."/>	* First Name: <input type="text" value="Jesse"/>	Middle Name: <input type="text" value="S."/>
* Last Name: <input type="text" value="Palacios"/>	Suffix: <input type="text"/>	
Title: <input type="text" value="Corporate Director"/>		
Organizational Affiliation: <input type="text" value="n/a"/>		
* Telephone Number: <input type="text" value="670-234-6866"/>	Fax Number: <input type="text" value="670-234-9821"/>	
* Email: <input type="text" value="j.palacios@nmhc.gov.mp"/>		

Application for Federal Assistance SF-424
<p><b>* 9. Type of Applicant 1: Select Applicant Type:</b></p> <p>U.S. Territory or Possession</p> <p>Type of Applicant 2: Select Applicant Type:</p> <p>Type of Applicant 3: Select Applicant Type:</p> <p>* Other (specify):</p>
<p><b>* 10. Name of Federal Agency:</b></p> <p>U.S. Department of Housing and Urban Development</p>
<p><b>11. Catalog of Federal Domestic Assistance Number:</b></p> <p>14.221</p> <p>CFDA Title:</p> <p>Emergency Solutions Grant</p>
<p><b>* 12. Funding Opportunity Number:</b></p> <p>n/a</p> <p>* Title:</p> <p>n/a</p>
<p><b>13. Competition Identification Number:</b></p> <p>n/a</p> <p>Title:</p> <p>n/a</p>
<p><b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b></p> <p>See attachment.</p> <p>Add Attachment Delete Attachment View Attachment</p>
<p><b>* 15. Descriptive Title of Applicant's Project:</b></p> <p>PY 2019 HESC Admin costs; Housing relocation and stabilization services; RMIS; Rapid re-housing assistance</p>
<p>Attach supporting documents as specified in agency instructions.</p> <p>Add Attachments Delete Attachments View Attachments</p>

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant: **CNMI** \* b. Program/Project: **CDRG**

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date: **01/03/20** \* b. End Date: **01/03/21**

**18. Estimated Funding (\$):**

* a. Federal	<b>77,332</b>
* b. Applicant	<b>0</b>
* c. State	<b>0</b>
* d. Local	<b>0</b>
* e. Other	<b>0</b>
* f. Program Income	<b>0</b>
* g. TOTAL	<b>77,332.00</b>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on .

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes", provide explanation and attach

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

**\*\* I AGREE**

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix: **Mr.** \* First Name: **Arnold**

Middle Name: **I**


\* Last Name: **Palacios**

Suffix:

\* Title: **Acting Governor**

\* Telephone Number: **670-237-2200** Fax Number:

\* Email: **arnoldpalacios.ltgov@gmail.com**

\* Signature of Authorized Representative:  \* Date Signed: **AUG 08 2019**

**#14 of the SF424**

Areas affected by CDBG- Low-mod income communities on Saipan, Tinian, and Rota

Areas affected by HESG- Low-mod income communities on Saipan

Areas affected by HOME-Low-mod Income communities on Saipan, Tinian, and Rota

**#15 of the SF424**

In the CDBG portion of the SF424, a list of primary projects are reflected. The CDBG alternate projects are the following:

- 1) Commonwealth Office of Transit Authority Bus Shelters (Alternate Project 1)
- 2) Kagman Community Park Phase II (Alternate Project 2)

**ASSURANCES - CONSTRUCTION PROGRAMS**

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title, or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal interest in the title of real property in accordance with awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progress reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

Previous Edition Usable

Authorized for Local Reproduction

Standard Form 424D (Rev. 7-87)  
Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
15. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 		TITLE Acting Governor, Arnold I. Palacios
APPLICANT ORGANIZATION Northern Marianas Housing Corporation		DATE SUBMITTED AUG 08 2019

SF-424D (Rev. 7-97) Back

**ASSURANCES - CONSTRUCTION PROGRAMS**

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title, or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal interest in the title of real property in accordance with awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progress reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4726-4783) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §54801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-618), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

Previous Edition Usable

Authorized for Local Reproduction

Standard Form 424D (Rev. 7-97)  
Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Acting Governor, Arnold I. Palacios
APPLICANT ORGANIZATION Northern Marianas Housing Corporation	DATE SUBMITTED AUG 08 2019

SF-424D (Rev. 7-97) Back

**ASSURANCES - CONSTRUCTION PROGRAMS**

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title, or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal interest in the title of real property in accordance with awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progress reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4726-4783) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §54801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

Previous Edition Usable

Authorized for Local Reproduction

Standard Form 424D (Rev. 7-97)  
Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Acting Governor, Arnold I. Palacios
APPLICANT ORGANIZATION Northern Marianas Housing Corporation	DATE SUBMITTED AUG 08 2019

SF-424D (Rev. 7-97) Back

## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

  
Signature of Authorized Official

AUG 08 2019  
Date

Acting Governor, Arnold I. Palacios  
Title

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

**Citizen Participation** – It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2019 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** -- It will comply with applicable laws.



Signature of Authorized Official

AUG 08 2019

Date

Acting Governor, Arnold I. Palacios

Title

**OPTIONAL Community Development Block Grant Certification**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

  
Signature of Authorized Official      AUG 08 2019  
Date

Acting Governor, Arnold I. Palacios  
Title

**Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

  
Signature of Authorized Official

AUG 08 2019  
Date

Acting Governor, Arnold I. Palacios  
Title

## **Emergency Solutions Grants Certifications**

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** - If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** - In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** - Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** - The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

**Matching Funds** - The recipient will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** - The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** - To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** - All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

**Discharge Policy** – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

  
Signature of Authorized Official

AUG 08 2019  
Date

Acting Governor, Arnold I. Palacios  
Title



**APPENDIX TO CERTIFICATIONS**

**INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

**Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.