



# NORTHERN MARIANAS HOUSING CORPORATION

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## NOTICE TO THE PUBLIC

### Available for Public Review & Comment Northern Marianas Housing Corporation Consolidated Plan (PY2025-2029) and PY2025 Annual Action Plan June 27, 2025 AMENDMENT

The Northern Marianas Housing Corporation (NMHC) announces the availability for public review and comment, the NMHC Consolidated Plan 2025-2029 (ConPlan) and the Program Year 2025 Annual Action Plan (AAP).

The ConPlan & AAP are mandated by the U.S. Department of Housing and Urban Development (HUD) Office of Community Planning and Development, for the use of Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG), and Housing Trust Fund (HTF) funds received by NMHC. NMHC is the Grantee of these HUD funds. NMHC administers CDBG, HOME, ESG, and HTF programs on behalf of the CNMI.

The ConPlan 2025-2029 sets forth NMHC's plan for supporting low- and moderate-income populations through the creation and preservation of decent housing, sustainable living environments, and economic opportunities over the next five years. The PY2025 AAP identifies NMHC's proposed use of HUD PY2025 CDBG, HOME, and ESG funds totaling **\$1,469,058.00** for the first year of this ConPlan cycle. A detailed list of the proposed projects and activities are shown below.

Community Development Block Grant		Project Sponsor	Project Type	Amount
1	Department of Community and Cultural Affairs/Division of youth Services Rehabilitation of Emergency Shelter	Department of Community and Cultural Affairs (DCCA)/ Division of Youth Services (DYS)	Public Facility	\$ 240,000.00
2	Department of Community and Cultural Affairs/Division of youth Services Expansion and Rehabilitation of the Tanapag Youth Center	Department of Community and Cultural Affairs (DCCA)/ Division of Youth Services (DYS)	Public Facility	\$ 144,000.00
3	Department of Community and Cultural Affairs/Division of youth Services Expansion and Rehabilitation of the Sinapalo Youth Center (Rota)	Department of Community and Cultural Affairs (DCCA)/ Division of Youth Services (DYS)	Public Facility	\$ 225,100.00
4	Department of Community and Cultural Affairs (DCCA)/Northern Marianas Sports Association (NMSA) for the Rehabilitation of the Miguel (Tan Ge') Pangelinan Field	Department of Community and Cultural Affairs (DCCA)/Northern Marianas Sports Association (NMSA)	Public Facility	\$ 175,000.00
5	Planning and Administrative Cost	NMHC	Program Administration	\$ 196,025.00
				<b>\$ 980,125.00</b>
Emergency Solutions Grant		Project Sponsor	Project Type	Amount
4	Homeless Prevention and Rapid Rehousing Assistance/ Housing Relocation and Stabilization Services / HMIS	NMHC	Homeless Prevention/ Rapid Rehousing	\$ 75,119.25
5	ESG Administrative Cost	NMHC	Program Administration	\$6,090.75
				<b>\$ 81,210.00</b>
HOME Investment Partnership Grant		Project Sponsor	Project Type	Amount
6	HOME Rehabilitation/Homebuyer New Construction Program	NMHC	Affordable Housing	\$ 346,564.55
7	HOME Administration	NMHC	Program Administration	\$ 61,158.45
				<b>\$ 407,723.00</b>

The ConPlan/AAP will be available electronically on NMHC's website at [www.nmhc.gov.net](http://www.nmhc.gov.net). If you would like to obtain a copy or require additional information, please contact **Jesse S. Palacios, Deputy Corporate Director at 234-6866** or by email at [jspalacios@nmhc.gov.net](mailto:jspalacios@nmhc.gov.net).

NMHC is inviting the public to comment on the proposed ConPlan and AAP.

#### The Schedules for the public hearing are as follows:

- July 14, 2025, 5:00 PM, NMHC Conference room for the island of Saipan
- July 14, 2025, 5:00 PM, Tinian Field Office, NMC Building A, for the island of Tinian
- July 14, 2025, 5:00 PM, Rota Field Office, Sinapalo, for the island of Rota.

Accommodation for individuals with disabilities or other non-English speaking individuals who wish to attend the briefing are available upon request by giving at least 24 hours' notice prior to the hearing to allow sufficient time to arrange the necessary services. To request special accommodations, contact Tricia Tenorio, NMHC Planner, at (670) 233-0076.

Any person(s), agency, or organization wishing to comment on the Consolidated Plan/Annual Action Plan (ConPlan/AAP) are encouraged to submit written comments to the NMHC main office in Garapan, Saipan no later than 4:30 PM on Friday, July 29, 2025.

# Executive Summary

## ES-05 Executive Summary - 91.300(c), 91.320(b)

### 1. Introduction

As a statutory requirement by the U.S. Department of Housing and Urban Development (HUD), the Commonwealth of the Northern Mariana Islands (CNMI) is hereby submitting its Five (5) Year Consolidated Plan (ConPlan) which covers Program Years 2025-2029 and its Annual Action Plan (AAP) for Program Year 2025. The ConPlan outlines the planned uses and goals for the CPD programs 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 HUD Community Planning and Development (CPD) grant funds for the CNMI. Governor Arnold I. Palacios has designated the Northern Marianas Housing Corporation (NMHC) to administer all HUD-funded programs. In the past year, NMHC has consulted with various individuals, agencies, mayors of all jurisdictions, and the current administration. NMHC gathered their input and found that similar goals and priorities were identified, some of which have changed due to the various events that took place in the past five years, notably the major disasters that have greatly impacted the CNMI. The top goal of NMHC and the CNMI is to promote and strengthen fair housing efforts for the citizens of the CNMI. The goals/priorities identified by these various stakeholders share the same vision and that is to improve the quality of life for the citizens of the CNMI through projects which will promote fair housing, increase special needs and low moderate income housing, support projects that enhance the community, enhance public services, create job opportunities for the low income population, build shelters for the most vulnerable populations, provide emergency rental assistance, harden infrastructure to increase resilience to disasters, and expand and sustain affordable housing in the CNMI.

Within the past five years, the CNMI has experienced one of the most catastrophic events to hit the islands. The catastrophic storm which was Super Typhoon Yutu (Yutu) struck the CNMI on October 24, 2018. The storm was considered the strongest typhoon to ever hit US soil since 1935. Yutu destroyed close to 5,000 homes, crippled the islands' infrastructure for months, and left thousands of residents scrambling for food, water, and shelter for months thereafter. Yutu caused close to \$900M in damage to the islands. With this said, we all can imagine the major impact it has caused to the CNMI's pre-existing housing crisis, its dwindling economy, and infrastructure, resulting in socio-economic disruptions, implementation of austerity measures, and slow economic growth. However, the CNMI remains resilient

and with the assistance of the US Federal Government, notably FEMA, HUD and the military, is recovering slowly but surely.

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

## **2. Summary of the objectives and outcomes identified in the ConPlan Needs Assessment Overview**

The CNMI outlined its goals and objectives for the next five years in a table found in SP-45. These goals and objectives were identified based on the needs assessment of the community and various agency state plans, including face to face consultation with various state agencies and CNMI citizens. The goals are (examples of projects are listed as well, in order of priority):

- Promote Fair Housing
- Special Needs and Low-Moderate Income Housing- new construction and acquisition of housing, rehabilitation of housing, implementation of energy-efficient features for housing
- Public Facilities and Improvements- fire stations and fire trucks (inclusive of life saving equipment), recreational facilities, youth centers and convention centers (equally prioritized), sports facilities
- Public Services – healthcare, services for senior citizens, public safety services, substance abuse programs, recreational programs
- Job Creation/Retention – promote employment opportunities for persons with disabilities, support micro businesses through loans or grants
- Emergency Shelter/Transitional Housing: typhoon shelters, homeless shelters and transitional housing
- Emergency Rental Assistance: homeless prevention assistance (at-risk families), rapid re-housing (literally homeless families) and food pantry program
- Disaster Recovery- construction or rehabilitation of homes, Infrastructure improvements, economic development activities and debris removal

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

The CNMI has invested CPD funds which have benefited homeless persons, special needs populations, Section 8 housing residents, and low-and moderate-income individuals and families. The CNMI has injected about \$15M in CDBG funds to support the various CDBG community projects that have benefited the islands' various populations. Over the past 5 years, through the CPD programs, the CNMI has contributed to the rehabilitation of public facilities which encourages community involvement and

enhancement, purchase of rescue vehicles and wildland trucks for the Department of Fire and Emergency Medical Services (DFEMS), provided funding for the demolition of perilous structures on the islands of Tinian and Rota, increased the number of recreational and sports facilities on all three islands, to name a few. The above mentioned projects, in addition to infrastructure improvement projects such as sewer systems, road repairs, and the construction or rehabilitation of existing homes, destroyed by Yutu, were completed in the past year which was absolutely critical for CNMI residents, in order to prevent health and safety hazards. NMHC continues to construct and complete public facilities and infrastructure improvement projects with CDBG-DR monies and will be completed by FY 2027. All other projects funded with CPD funds will continue until CPD funds are no longer available for the CNMI. 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 or at the verge of homelessness. The CNMI has injected about \$10M 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. The CNMI has injected about \$1M of ESG monies to homelessness and rapid re-housing services, in addition to implementing the Homeless Management Information System in the CNMI to better track and monitor HESG-assisted families .

#### **4. Summary of citizen participation process and consultation process**

The CNMI is required by HUD to have a detailed Citizen Participation Plan (CPP) which incorporates the islands' policies and procedures for public involvement in the Consolidated ConPlan process and the use of Community Development Block Grant (CDBG), HOME Investment Partnerships Grant (HOME), and Emergency Solutions Grant (ESG) funds. The CNMI's CPP is made available to the public. Additionally, regulations require that this CPP 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 CPP, AAP and CoPlan must be made available for a total of 30 days for the public to provide comments. In addition, the CNMI provides the general public a fifteen-day (15) notice before informing them of the public hearings to be held on the islands of Saipan, Tinian, and Rota to discuss the Five Year Consolidated Plan and Annual Action Plan. Consultations, in preparation for the ConPlan were conducted, to solicit for comments, input, and recommendations on the priorities, goals, and objectives for the next five years. NMHC conducted several in-person meetings with various agencies, individuals, Legislators, the mayors of all CNMI jurisdictions, and its Board of Directors to accomplish such. See Appendix A (A.1, A.2, etc) for attendance sheets of the consultation meetings. In addition, The ConPlan/AAP was made available from June 27, 2025 to July 18, 2025. See public notices- Appendix B and B.1 for public notices. The notices for public hearings were published on June 27, 2025,

July 11, 2025 and July 25, 2025 and the public hearings were held on July 14, 2025. Also see Appendix C for the CNMI's Amended Citizen Participation Plan.

**5. Summary of public comments**

No comments were received.

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

No comments were received.

**7. Summary**

No comments were received.

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.300(b)

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

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

Agency Role	Name	Department/Agency
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
HTF Administrator	NORTHERN MARIANA ISLANDS	Community Planning and Development Division

**Table 1 – Responsible Agencies**

### Narrative

The Northern Marianas Housing Corporation is the lead agency responsible for preparing the CNMI Five Year Consolidated Plan for Program Years 2025-2029. The following individuals are responsible for HUD-funded programs:

Zenie P. Mafnas, Corporate Director (Oversees all HUD-funded programs)

Jesse S. Palacios, Deputy Corporate Director; Tricia B. Tenorio, Planner ; Jacob Muna, Office Manager/Procurement Officer; Brandy Gonzales, Planning Administrative Assistant (CDBG, HTF, HESG Programs)

Christopher Pangelinan, Mortgage and Credit Manager (HOME Program)

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

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

**Consolidated Plan Public Contact Information**

Lead Contact(s):       Zenie P. Mafnas, Corporate Director

                                  Jesse S. Palacios, Deputy Corporate Director

                                  Northern Marianas Housing Corporation

                                  PO Box 500514

                                  Saipan, MP 96950

                                  670-234-6866

## **PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.200(I) and 91.315(I)**

### **1. Introduction**

**This section documents the CNMI’s consultation efforts and stakeholder engagement strategies conducted during the development of its Consolidated Plan.**

The PR-10 Consultation process serves as the foundation for building strategic partnerships and gathering input to inform funding priorities, including those addressed through the ESG, CDBG, HTF, and HOME programs. In the CNMI, these consultations are tailored to reflect the unique geographic, cultural, and economic context of the islands while maintaining compliance with federal standards.

**Provide a concise summary of the state’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 (CoC) Program in place, NMHC coordinates the delivery of services with agencies such as the Department of Labor, Karidat Social Services, Department of Community and Cultural Affairs- Division of Youth Services, Council on Developmental Disabilities, Office of the US Delegate, Center for Living Independently, Community Guidance Center, the Public School System, Office of the Governor and Lt. Governor, Office of the Mayors of Saipan, Tinian, and Rota, Commonwealth Utilities Corporation, Department of Public Works, Department of Fire and Emergency Medical Services, Capital Improvement Project Office, Hazard Mitigation Office, and the Department of Public Health. These agencies respond to the needs of youth, families, and adults. Needs may vary from employment, independent life skills, health and mental health, and financial needs. During the March 2024 Consultation , government and non-profit organizations were invited to attend and were encouraged to provide input verbally, through a comprehensive survey, and an activity, so that NMHC could gather information, as to the type of needs that NMHC could potentially address within the next five years.

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

The CNMI currently does not have a CoC Program in place. However, In March of 2016, NMHC collaborated with government, private, and non-profit organization to form what is now called “the CNMI Homeless Prevention Coalition.” NMHC, in collaboration with the members of the newly formed coalition, started planning the first ever Point-In-Time (PIT) count for the CNMI. The logistics and

planning of the PIT count was successful. The goal of the coalition is to obtain funding from HUD through the CoC Program for the following: outreach services; case management services; job search services; rapid rehousing rental assistance; Homeless Management Information System (HMIS) software program; and referrals to mainstream resources (e.g., health services; Medicaid, etc.). More importantly, the coalition would like to focus on providing rapid re-housing services to the homeless families and individuals. We anticipate having the program participants obtain employment and maintain their housing before exiting the program. In addition, NMHC participates in quarterly membership meetings with the Mental Health Planning Council, which includes members from a variety of social service providers such as the Northern Marianas Protection and Advocacy Systems, Inc., Karidat Social Services with Guma Esperansa (domestic violence shelter), Department of Community and Cultural Affairs with the Division of Youth Services Shelter (shelter for youth and children), and the Salvation Army. Since 2019, NMHC has directly administered the HESG Program and provides housing relocation and stabilization services for individuals in need of rapid re-housing and homelessness prevention assistance. NMHC also performs evaluations to ensure the assisted families are able to sustain their housing status after their 12-month assistance. Moreover, the The Guma Esperansa Domestic Violence Shelter serves women and children who are victims of domestic violence, and the Division of Youth Services Shelter serves children and youth who are victims of child abuse and neglect (both populations are categorized as homeless due to their situations). Although there were veterans who availed of the ESG Program, there is no program available in the CNMI specifically for homeless veterans such as VASH.

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

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

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

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

1	<b>Agency/Group/Organization</b>	Karidat Social Services
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence Services-homeless Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Although the NMHC currently administers the HESG Program, the NMHC consults with Karidat Social Services on a frequent basis. Karidat Social Services is also engaged in discussing the effective use of Emergency Solutions Grant funds and what particular areas of the program can be improved to ensure that housing stability is achieved by the ESG-assisted household. Karidat Social Services also administers short-term rental assistance, through a DHHS grant, for homeless families who need a temporary place to stay, as they seek for permanent residence. They also provide food vouchers and donated clothing for those in need. In addition, NMHC case workers are very much involved in the re-evaluation of the households and identifies ways the household can improve their financial status in order to continue living in safe, sanitary, and decent housing. The increased coordination with Karidat Social Services enables NMHC to improve the HESG Program every year and streamline its processes accordingly to better meet the needs of the clients.
2	<b>Agency/Group/Organization</b>	CNMI Department of Labor (DOL)
	<b>Agency/Group/Organization Type</b>	Services-Employment Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Anti-poverty Strategy

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	NMHC consults with DOL, through the Workforce Investment Agency Division, on the type of programs available for low-mod income individuals, most of whom are participants in the HUD-assisted program. DOL is the only entity in the CNMI that provides training services such as the Individual Training Program, Program of Training Services (client may obtain a certification of completion in a particular field of study, a secondary school diploma or equivalent, or employment). Anticipated outcome of the consultation is increased success rate in the FSS Program and an increase in the CNMI local workforce.
3	<b>Agency/Group/Organization</b>	Offices of the Mayors of Saipan, Tinian, and Rota
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Anti-poverty Strategy Community Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Mayors of all (3) jurisdictions were consulted and they have demonstrated the need for mainly public facilities, such as recreational facilities, and infrastructure upgrades (to become more resilient) on the islands of Saipan, Tinian, and Rota, and just in the recent months, have expressed their thoughts on the need for typhoon shelters, in the times of disasters, and transitional housing for those in need of emergency shelter, as they seek for a permanent place to stay. These types of projects are being sought after to promote the local economy, health and wellness, youth activities, and public safety. Their input allows NMHC to prioritize the type of CPD projects to be funded in the next five years.
4	<b>Agency/Group/Organization</b>	American Red Cross (ARC)
	<b>Agency/Group/Organization Type</b>	Services - Housing Services - Victims Agency - Emergency Management
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Disaster Management

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

	<b>Agency/Group/Organization Type</b>	Other government - Local Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Data Library for Consolidated Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	OPD played a critical role in the development of the Consolidated Plan. The office was created to institute an interagency framework within which OPD can support the collection of data to achieve its missions and mandates. The OPD also maintains a data library for the continual storage and collection of public information needed or utilized during the planning process. OPD drafted the Comprehensive Economic Development Strategy for the CNMI and created the Planning and Development Advisory Council to fulfill the project prioritization, planning, and data centralization mandates of Public Law 20-20. With the lack of recent data in the CNMI, OPD was able to assist in providing citizen-centric reports, updated census surveys, and other strategic plans to assist in various sections of the Consolidated Plan.
7	<b>Agency/Group/Organization</b>	Office of the Governor-Council on Developmental Disabilities
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Other Needs- Persons with Disabilities

<p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>NMHC mainly consults with the Developmental Disabilities Council, a branch under the Office of the Governor. The DD Council's mission is to promote the independence, productivity, integration, and inclusion of those with developmental disabilities into the community, many of which qualify for HUD-assistance. DD Council and other social service providers have expressed the need for independent living centers on the islands of Tinian and Rota, just as the CDBG-funded Independent Living Center on Saipan (funded by CDBG). Other needs include job training and recreational programs for persons with disabilities. The coordination with DD Council and the data provided by the agency allows NMHC to demonstrate the need for such programs in the CNMI through the Consolidated Plan.</p>
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**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 NMHC does not have a Continuum of Care in place, but the CNMI has officially created the CNMI Homeless Prevention Coalition. The goal of the coalition is to obtain funding from HUD through the CoC program for the following: outreach services; case management services; job search services; rapid rehousing rental assistance; Homeless Management Information System (HMIS) software program; and referrals to mainstream resources (e.g. health services; Medicaid, etc.). More importantly, the Coalition would like to focus on providing rapid re-housing services to the homeless families and individuals.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Community Services Block Grant 2024 State Plan	Department of Community and Cultural Affairs	The goals of the State Plan include the continued support of activities designed to assist low income families and individuals, homeless families and individuals, and elderly low income individuals and families.
Workforce Investment Opportunity Act (FY 2024- 2027)	CNMI Department of Labor- Workforce Investment Agency	The goals of the State Plan is the continuous improvement of job, education and training services through collaborative partnerships with government agencies, private businesses, and CNMI workers to fully recognize the importance of education, training, and economic development, and in turn, help the low income family and individual become self-sufficient.
CNMI Four Year State Plan on Aging (2023-2027)	Department of Community and Cultural Affairs	The goals of the State Plan address the needs of islands' elderly population to include public facilities and improvements, housing, and services to such populations.
Northern Marianas Office of Vocational Rehabilitation (2024-2027)	CNMI Office of Vocational Rehabilitation	The goals of the Strategic Plan address the housing and supportive service needs of persons with disabilities.
CNMI Council on Developmental Disabilities State Plan (2022-2026)	CNMI Council on Developmental Disabilities	The goals of the Strategic Plan address the housing and supportive service needs of persons with disabilities.
Northern Marianas Housing Corporation PHA 5-Year Plan	Northern Marianas Housing Corporation	The goals of the Strategic Plan address the needs of Section 8 HCV and Multi-Family Program residents.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
CNMI Office of Planning and Development	Green Growth Initiative (2024)	GGI is a set of development strategies focused on improving the resiliency of the built environment. Through GGI, Pacific Islands' Government works to develop communities that maximize public health and safety, economic opportunity and lifestyle choices that can withstand changes in climate and extreme weather events to reduce societal and economic burdens of recovery.

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

**Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(l))**

The CNMI coordinated with the Mayors of all CNMI jurisdictions, the 23rd CNMI Legislature, the 23rd Senate, various government agencies, non-profit organizations, by discussing the various community needs in the community to include those of homeless persons, non-homeless special needs persons, and public housing residents. Relevant State plans were reviewed to gather information to substantiate the priorities and goals of this Consolidated Plan. Efforts were made to identify the needs of the islands' varying population. Information obtained in this ConPlan was derived from various State Plans, consultation with various groups and agencies, and the U.S. Census Bureau. This Plan will be made available for public review and comment from June 27, 2025 to July 29, 2025. The public is encouraged to submit oral or written comments which must be received by the Northern Marianas Housing Corporation no later than 4:30 p.m., July 29, 2025. A hearing will be held on July 14, 2025, to inform the public about this ConPlan.

**Narrative (optional):**

The CNMI's centralized government structure allows for streamlined coordination between state-level agencies and local implementation partners. Cross-agency collaboration ensures that Consolidated Plan goals are aligned with broader development strategies, and that services reach vulnerable populations across all islands. This cooperative approach supports the effective and efficient use of federal resources in meeting the CNMI's housing and community development goals.

## **PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(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 islands' policies and procedures for public involvement in the Consolidated Plan process and the use of Community Development Block Grant (CDBG), HOME Investment Partnerships Grant (HOME), Emergency Solutions Grant (ESG) funds and Housing Trust Fund (HTF). The CNMI's Citizen Participation Plan is made available to the public. Additionally, regulations require that the CPP 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 CPP, AAP and ConPlan must be made available for a total of 30 days for the public to provide comments. In addition, the CNMI provides the general public a fifteen-day notice before informing them of the public hearings to be held on the islands of Saipan, Tinian, and Rota to discuss the Five Year Consolidated Plan and Annual Action Plan. Consultations, in preparation for the ConPlan were conducted, to solicit for comments, input, and recommendations on the priorities, goals, and objectives for the next five years. NMHC conducted several, in-person meetings with various agencies, individuals, Legislators, the Mayors of all CNMI jurisdictions, and its Board of Directors to accomplish such. **See Appendix A** (and all attachments under Appendix A) for attendance sheets of the Consultation meetings. In addition, The ConPlan/AAP was made available from June 27, 2025 to July 29, 2025. See **Appendix D** for Notices Soliciting input on ConPlan goals (portion of the notice was announcing the PY 2025 Notice of Funding Availability and the projects that were being funded with PY 2025 funds). Part of the Attachment is also Notices for Funding Availability for the PY 2025 Annual Action Plan. See public notice- **Appendix B**. The notices for public hearings were published on June 27, 2025, July 11,2025 and July 25, 2025 and the public hearings were held on July 14, 2025. The CNMI also published an advertisement on the Saipan Tribune and on their website, the island's newspaper of general circulation and also published the ConPlan/AAP on NMHC's website, the Office of the Governor's website, and was made available, upon request.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response /attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Newspaper Ad	Non-targeted /broad community		No comments were received.		
2	Internet Outreach	Non-targeted /broad community		No comments were received.		www.nmhcgov.net, www.gov.mp, www.saipantribune.com

**Table 4 – Citizen Participation Outreach**

# Needs Assessment

## NA-05 Overview

### Needs Assessment Overview

The CNMI is located in the Western Pacific comprising a chain of 14 islands of which, 3 of the islands are mainly inhabited- Saipan, Tinian, and Rota. The island of Saipan is measured at 44.55 square miles and is divided into 30 villages – Achugao, As Lito, As Matuis, As Perdido, As Teo, As Terlaje, Capitol Hill, Chalan Kanoa, Chalan Kiya, Chalan Laulau, Chalan Piao, China Town, Fina Sisu, Dandan, Garapan, Gualo Rai, Kagman (I, II, III, IV), Kannat Tabla, Koblerville, Lower Base, Marpi, Navy Hill, Oleai, Papago, Sadog Tasi, San Antonio, San Roque, San Vicente, Susupe, and Tanapag. The island of Tinian is measured at 39 square miles and its main village is San Jose. The island of Rota is measured at 33 square miles and is divided into 2 villages- Sinapalo and Songsong. The island of Saipan, capital of the CNMI, holds 89% of the CNMI's total population. Eight percent of Saipan's entire population reside in the village of Garapan, located in the central part of the island. The population in the CNMI decreased by 12.2% from the last decennial Census in 2010 bringing the population total from 53,883 to 47,329. As per the 2020 Census, the median income in the CNMI is \$31,362 which increased by 38% from the 2010 Census. The CNMI 2020 Census data demonstrates that in 2020, 71% are renter households, while 29% are owner households. Of the 4,137 owner households, 19% are still paying a mortgage or loan. The number of owner-occupied households and renter households remained constant from 2010 to 2020. The Asian population continues to account for slightly more than 50% of the islands' households. These figures are based on the 2020 Census. The figures demonstrate that a majority of owner-occupied units are of Native Hawaiian or Pacific Islander descent (3,082 out of 4,137 households), and the same majority percentage are of Asian descent in renter-occupied units (6,892 out of 10,145).

According to the US Census 2020, a householder refers to "the person (or one of the people) in whose name the housing unit is owned or rented (maintained). The person designated as the householder is the "reference person" to whom the relationship of all other household members, if any, is recorded." The significant changes are evident in the householder's age. The CNMI saw a 53% decrease in householders in owner-occupied units between the ages of 25-34 and a 39% decrease in householders in renter-occupied units with the same age range. Householders within the 45-54 age range increased by 52% in renter-occupied units, while householders in owner-occupied units within the same age range remained steady since 2000 to 2010. There was also a 59% increase in householders whose age ranged from 65-74 years old in renter-occupied units, while there was a 29% increase in householders within the same range in owner-occupied units. As with the elderly population, for those ages 75-84, there was a 50% increase in householders since 2000 and a 31% increase for those 85 and over in owner-occupied units. For the renter-occupied units, there was an increase of 36% in householders' ages 75-84, and a 50% increase in householders ages 84 and over.

## **NA-10 Housing Needs Assessment - 24 CFR 91.305 (a,b,c)**

### **Summary of Housing Needs**

In this section, the CNMI assessed the housing needs of the community based on income level, tenure type, household type, and by housing problems, including housing cost burden, overcrowding and substandard housing conditions. HUD identifies the income category based on household size and household income. For example, a three-person household who reported to earn less than \$14,650 during the 2020 Census, will fall under 30% AMI. Tenure type is defined as households who are renting, own the house but paying mortgage, rent free, or own the house free and clear. Household types are defined further by small or large family households, households with children, single-person households, unrelated households, and elderly households. Households identified with a housing cost burden were those with housing costs that were greater than 30% or 50% of their income. Data was extracted from the US Census Bureau Report for Years 2010, 2020, and the most recent CNMI Department of Commerce reports. Breakdown for the following categories for the HUD Area Family Median Income is unavailable through the Comprehensive Housing Affordability Strategy.

DR 4404 data extracted from the CNMI's CDBG-DR Action Plan: This needs assessment includes specific details about unmet needs within the eligible and most impacted and distressed communities. A comprehensive needs assessment was conducted in accordance with HUD guidance. NMHC reached out to government and non-profit entities to solicit priority projects. These activities, programs, and projects were then evaluated for their connections to short- and long-term recovery efforts. Housing projects were based on FEMA, Census, and the American Red Cross data for single and multi-family housing. A scoring criterion will be used for infrastructure. The needs assessment provided allocation to Housing, Infrastructure, and Economic Development and projects for most impacted and distressed areas. Considerations for housing also included infrastructure and economic development activities that support housing. Super Typhoon Yutu created devastation and impacts across the Islands. Under DR 4404, FEMA approved 6,958 applications totaling \$41,465,716.52 for Individual Assistance. The Islands of Saipan and Tinian were designated as Most Impacted Areas by HUD's most impacted areas formula with the majority of the population residing on Saipan. The islands of Saipan and Tinian were most impacted by the storm and where the most needs were identified post-storm. The CNMI concurs with HUD that Saipan and Tinian should be designated as the most impacted and distressed areas. Therefore, there is no "State" identified most impacted or distressed areas that differ from HUD. The need for the Islands is significant and the HUD allocation of CDBG-DR funds will address a portion of the needs. To demonstrate the unmet needs, the CNMI is utilizing the best available data from the U.S. Census, FEMA, SBA, and other sources. The Preliminary Damage Assessment Report from FEMA used to determine the major disaster declaration indicates that over 700 residences were impacted with less than 6 percent of the residences insured. To support the needs assessment data, the American Red Cross estimated that over 51,000 persons and over 19,000 households were impacted by wind. The damage from wind severely impacted communication, power, and transportation. The CNMI allocated approximately 46 percent towards a variety of housing activities such as rehabilitation, reconstruction, new construction, and homeownership.

<b>Demographics</b>	<b>Base Year: 2010</b>	<b>Most Recent Year: 2020</b>	<b>% Change</b>
Population	53,883	47,329	-12%
Households	16,035	14,282	-11%
Median Income	\$19,958	\$31,362	+57%

**Table 5 - Housing Needs Assessment Demographics**

**Data Source Comments:**  
 US Census Data 2010 and  
 2020

**Number of Households Table**

	<b>0-30% HAMFI</b>	<b>&gt;30-50% HAMFI</b>	<b>&gt;50-80% HAMFI</b>	<b>&gt;80-100% HAMFI</b>	<b>&gt;100% HAMFI</b>
Total Households	3,990	4,042	2,386	1,554	4,063
Small Family Households	320	3,326	1,983	1,322	3,655
Large Family Households	423	716	403	232	408
Household contains at least one person 62-74 years of age	128	128	94	70	324
Household contains at least one person age 75 or older	31	54	44	26	84
Households with one or more children 6 years old or younger	640	668	372	264	477

**Table 6 - Total Households Table**

**Data Source Comments:**  
 US Census Data 2010 and 2020

## Housing Needs Summary Tables

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

	Renter					Owner				
	0-30% AMI	>30-5 0% AMI	>50-8 0% AMI	>80-1 00% AMI	Total	0-30% AMI	>30-5 0% AMI	>50-8 0% AMI	>80-1 00% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	753	596	212	89	1,650	143	121	89	54	407
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	258	478	246	128	1,110	30	62	69	59	220
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	249	439	297	171	1,156	45	85	86	91	307
Housing cost burden greater than 50% of income (and none of the above problems)	1,148	628	186	49	2,011	53	69	56	35	213

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	186	205	73	33	497	3	8	18	15	44
Zero/negative Income (and none of the above problems)	0	0	0	0	0	0	0	0	0	0

**Table 7 – Housing Problems Table**

Data Source  
Comments:

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

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

**Table 8 – Housing Problems 2**

Data Source  
Comments:

### 3. Cost Burden > 30%

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

Table 9 – Cost Burden > 30%

Data Source  
Comments:

### 4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50 % AMI	>50-80 % AMI	Total	0-30% AMI	>30-50 % AMI	>50-80 % AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	149	164	58	371	19	28	22	69
Large Related	918	502	149	1,569	162	102	55	319
Elderly	72	70	38	180	55	76	72	203
Other	0	0	0	0	0	0	0	0
Total need by income	1,139	736	245	2,120	236	206	149	591

Table 10 – Cost Burden > 50%

Data Source  
Comments:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50 % AMI	>50-8 0% AMI	>80-1 00% AMI	Total	0-30 % AMI	>30-5 0% AMI	>50-8 0% AMI	>80-1 00% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Single family households	653	1,145	635	346	2,779	136	214	205	183	738
Multiple, unrelated family households	352	618	299	152	1,421	71	98	104	80	353
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	1,005	1,763	934	498	4,200	207	312	309	263	1,091

**Table 11 – Crowding Information – 1/2**

Data Source  
Comments:

	Renter				Owner			
	0-30% AMI	>30-5 0% AMI	>50-8 0% AMI	Total	0-30 % AMI	>30- 50% AMI	>50- 80% AMI	Total
Households with Children Present	2,941	2,984	1,530	7,455	518	623	614	1,755

**Table 12 – Crowding Information – 2/2**

Data Source  
Comments:

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

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

Note: NMHC gathered data up until FY 2023. The pre-applications for Section 8 Programs does not ask for the applicants’ information with regards to whether they are victims of domestic violence, dating violence, sexual assault or stalking; however, NMHC gathered statistical data (FY 2020-2023) from Guma

Esperansa, the only domestic violence shelter on island, and from FY 2020-2023, a total of 141 women and 188 children were housed. The HESG Program defines those living in a shelter as being at risk of homelessness; therefore, NMHC will use the FY 2023 stats to estimate the number of families in need of housing assistance. In FY 2023, 39 families who were victims of domestic violence were in need of housing assistance. The HCVP Program, with a waiting list of 284 households, includes 41 families with a member or members with a disability. In the Multifamily Program, with a waiting list of 351 households, 24 families are with a member or members with a disability.

### **What are the most common housing problems?**

**The most pressing housing problems in the CNMI include:**

- **High cost burdens**
- **Overcrowding**
- **Substandard housing conditions**
- **Shortage of affordable and accessible rental housing**
- **Vulnerability to disaster-related displacement**

**These challenges are disproportionately felt by low-income households, persons with disabilities, elderly residents, and families living in remote or rural areas. The Consolidated Plan aims to address these issues through strategic investments in affordable housing development, rehabilitation, and supportive services.**

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

In analyzing the 2020 statistical data, it becomes evident that CNMI households who are most affected are the extremely low income to middle income families. This result could be attributed to the inability for families to adequately save money to service housing problems/repairs, such as those related to plumbing, electrical, and kitchen facilities.

Overcrowding results can be attributed to the lack of disposable income and funds to expand or extend units to provide for improved housing space and bedroom sizes for all those who are household

members. This problem of overcrowded homes is estimated to continually rise, possibly at a slower rate, but as the CNMI population rebounds to increasing its residential areas and coupled by the continual cost increases in goods and services, as well as overall price increases in materials; the CNMI will need to reassess how to better handle the housing problems that currently exist so as to help prevent future problems from perpetuating.

Further analysis on extremely low-income households from the 2020 U.S. Census statistics (households with one or more severe housing problems), clearly shows that family households that fall within 0-30% of the AMI are the predominant household income group who are mainly affected as compared to others, such as the middle to upper income categories. This is especially high among renters, and could be due in part to the relatively large number of renter households as compared to owner households. Looking at the numbers for the extremely low-income households (0-30% of the AMI), it is estimated that 34 percent, or 3,932 of the total 10,145 renter households, have at least one or more of the four housing problems. On the other hand, owner-occupied households show a relatively equal distribution between 20-30 percent across household income categories.

**Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

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

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

The CNMI started the Point in Time Counts in 2017 and continued with the count up to 2019, until the COVID pandemic prevented NMHC from conducting another PIT count. As a result, the CNMI has focused its attention and has strengthened its assessment methods to address the problems of homeless and persons at risk of homelessness. As such, NMHC continues to provide needed services and funding assistance, such as the Homeownership Investment Partnerships (HOME) Program to assist qualified low income families in the community with a safe, decent, sanitary, and affordable home, in addition to the

Emergency Solutions Grant (HESG) Program which provides funds for services specifically programmed to address homelessness, as well as implementing preventative measures to help individuals or families who are at risk of being homeless.

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

Housing cost burdens placed on the extremely low income households are more likely to experience instability and at risk of being homeless. Based on estimates derived from the 2020 U.S. Census, large families that fall within the 0-30% AMI with cost burden greater than 30 percent and 50 percent are at risk. Housing affordability in the CNMI is dependent on the size of the family, total household income, and property location. The larger the family, or household size, and the lesser of a total income, results in a heavier burden being placed on a family to sustain.

In the CNMI, it is estimated that 350 lower income owner-occupant households are currently experiencing excessive monthly housing cost burdens, due to mortgage payments and high utility costs. The case is also evident among renter-occupant households as it is estimated that at least 2,000 are being affected by monthly rental cost burdens. It becomes clear that there is a high percentage of large family households in the CNMI who have high rent payments and utility costs. These are families that fall within the 0-30% AMI group and are experiencing costs that are more than 50 percent of their total household income. In addition to the above characteristics, close to 45% of the CNMI homes' roofs were either made out of tin or wood, which did not withstand the 200+MPH winds of Super Typhoon Yutu which made landfall in October 2018. According to the American Red Cross data, there were close to 5,000 homes that were either major or completely destroyed. As a result, many CNMI households living in FEMA provided tents, as they waited for FEMA or SBA assistance. Unfortunately, close to 10% of those households still live in the tents today, which causes instability in the household and an increased risk of homelessness.

### **Discussion**

The CNMI has created goals such as 1) Expanding services to the homeless (both literally homeless and at-risk of homelessness) 2) Sustain affordable housing stock- by providing HOME Funds to qualified families who are experiencing one or more housing problems- to rehabilitate their homes to safe, sanitary, and decent standards. The CNMI aims to meet those goals in the first year of the ConPlan.

## NA-15 Disproportionately Greater Need: Housing Problems - 91.305 (b)(2)

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

### Introduction

This section of the ConPlan discusses the housing needs of racial or ethnic groups at any of HUD's income levels. According to HUD, a disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. CNMI households with severe housing problems experienced one or more of the following: 1) Lacks complete kitchen facilities; 2) Lacks complete plumbing facilities; 3) More than 1.5 persons per room, 4) Cost Burden over 50%. Based on the data in the tables below, the Asian ethnic group, within 30-50% AMI, experienced one or more housing problems:

### 0%-30% of Area Median Income

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

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**  
US Census Bureau data for the CNMI 2010

Data Source Comments:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden greater than 30%

### 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,325	1,922	0
White	133	77	0
Black / African American	7	4	0
Asian	1,862	1,076	0
American Indian, Alaska Native	221	128	0
Pacific Islander	1,097	634	0
Hispanic	5	3	0
0	0	0	0

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**  
US Census Bureau Data for the CNMI, 2010

**Data Source Comments:**

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden greater than 30%

### 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,085	1,179	0
White	83	47	0
Black / African American	5	3	0
Asian	1,168	660	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
American Indian, Alaska Native	138	78	0
Pacific Islander	688	389	0
Hispanic	3	2	0
0	0	0	0

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**  
 US Census Bureau Data for the CNMI, 2010

Data Source Comments:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden greater than 30%

**80%-100% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,411	818	0
White	56	33	3
Black / African American	2	790	458
Asian	94	54	0
American Indian, Alaska Native	466	270	0
Pacific Islander	466	270	0
Hispanic	2	1	0
0	0	0	0

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**  
 US Census Bureau Data for the CNMI, 2010

Data Source Comments:

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden greater than 30%

## **Discussion**

**In the CNMI, Pacific Islander and Asian households exhibit a disproportionately greater need due to elevated rates of cost burden, overcrowding, and substandard housing. These disparities are tied to socioeconomic status, access to stable employment, and the availability of culturally appropriate and affordable housing.**

**The CNMI's housing strategies must prioritize these populations by expanding affordable rental options, promoting rehabilitation of substandard units, and increasing outreach to underserved racial and ethnic communities.**

## NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.305(b)(2)

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

### Introduction

This section of the Plan discusses the housing needs of racial or ethnic groups at any of HUD’s income levels. According to HUD, a disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. CNMI households with severe housing problems experienced one or more of the following: 1) Lacks complete kitchen facilities; 2) Lacks complete plumbing facilities; 3) More than 1.5 persons per room, 4) Cost Burden over 50%. Based on the data in the tables below, the Asian ethnic group, within 30-50% AMI, experienced one or more severe housing problems.

### 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,094	2,136	0
White	124	85	0
Black / African American	7	5	0
Asian	1,733	1,196	0
American Indian, Alaska Native	205	142	0
Pacific Islander	1,021	705	0
Hispanic	4	3	0
0	0	0	0

**Table 17 – Severe Housing Problems 0 - 30% AMI**

US Census Bureau Data for CNMI 2010

Data Source Comments:

\*The four severe housing problems are:

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

### 30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,325	1,922	0
White	133	77	0
Black / African American	7	4	0
Asian	1,862	1,076	0
American Indian, Alaska Native	221	128	0
Pacific Islander	1,097	634	0
Hispanic	5	3	0
Other	0	0	0

**Table 18 – Severe Housing Problems 30 - 50% AMI**  
US Census Bureau Data for CNMI 2010

Data Source Comments:

\*The four severe housing problems are:

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

### 50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,085	1,179	0
White	83	47	0

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Black / African American	5	3	0
Asian	1,168	660	0
American Indian, Alaska Native	138	78	0
Pacific Islander	688	389	0
Hispanic	3	2	0
Other	0	0	0

**Table 19 – Severe Housing Problems 50 - 80% AMI**  
US Census Bureau Data for CNMI 2010

**Data Source Comments:**

\*The four severe housing problems are:

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

**80%-100% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	1,411	118	0
White	56	33	0
Black / African American	3	2	0
Asian	790	458	0
American Indian, Alaska Native	94	54	0
Pacific Islander	466	270	0
Hispanic	2	1	0

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Other	0	0	0

**Table 20 – Severe Housing Problems 80 - 100% AMI**  
 US Census Bureau Data for CNMI 2010

Data Source Comments:

\*The four severe housing problems are:

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

## Discussion

## NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.305 (b)(2)

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

### Introduction

This section discusses the housing cost burden of racial and ethnic groups. According to HUD, a disproportionately greater need exists when the members of a racial or ethnic group at a given income level are experiencing housing problems at a greater rate (10 percentage points or more) than the income level as a whole.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	1,560	994	355	0
White	62	40	14	0
Black / African American	3	2	1	0
Asian	874	557	199	0
American Indian, Alaska Native	104	66	24	0
Pacific Islander	515	328	117	0
Hispanic	2	1	0	0
0	0	0	0	0

**Table 21 – Greater Need: Housing Cost Burdens AMI**

US Census Bureau Data for the CNMI 2010

Data Source Comments:

### Discussion

Housing cost burden continues to be a problem among the extremely low to the low income households in the CNMI. Data derived from the 2010 U.S. Census show that approximately 1,500 households across racial and ethnic groups are experiencing high costs related to owning or renting a home as well as the increases in costs due to the associated expenses that come with owning and/or living in a home. As

indicated on Table 21, Asians, predominantly migrant workers, and the Pacific Islander racial or ethnic groups, which include the Indigenous Chamorros and Carolinians are the most affected by housing costs.

### **NA-30 Disproportionately Greater Need: Discussion – 91.305 (b)(2)**

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

**Yes. In the CNMI, analysis of available data and local stakeholder input suggests that certain racial and ethnic groups experience disproportionately greater housing needs within specific income categories—particularly at the Extremely Low-Income (0–30% of Area Median Income) and Very Low-Income (31–50% AMI) levels.**

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

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

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

## NA-35 Public Housing – (Optional)

### Introduction

The Northern Marianas Housing Corporation (NMHC) is also the Public Housing Agency (PHA) in the CNMI. Under the Section 8 Housing Assistance Payments Program

– New Construction – NMHC owns and operates a total of 118 units throughout four (4) housing developments/project sites in the CNMI. In addition, NMHC may administer up to a total of 374 vouchers, of which 88% are currently being utilized (as of February 2020, date of data collection).

NMHC is unable to input data into the tables, since it is automatically generated from the PIC Report.

### Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	0	341	0	341	0	0	0

**Table 22 - Public Housing by Program Type**

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

Data Source: PIC (PIH Information Center)

## Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	0	21	0	21	0	0
# of Disabled Families	0	0	0	27	0	27	0	0
# of Families requesting accessibility features	0	0	0	341	0	341	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

**Table 23 – Characteristics of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

**Race of Residents**

Race	Certificate	Mod-Re hab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project -based	Tenant -based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	0	0	0	0	0	0	0
Black/African American	0	0	0	0	0	0	0	0	0
Asian	0	0	0	84	0	84	0	0	0
American Indian/Alaska Native	0	0	0	0	0	0	0	0	0
Pacific Islander	0	0	0	257	0	257	0	0	0
Other	0	0	0	0	0	0	0	0	0

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

**Table 24 – Race of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

## Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	0	1	0	1	0	0	0
Not Hispanic	0	0	0	340	0	340	0	0	0

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

**Table 25 – Ethnicity of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

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

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

**What are the number and type of families on the waiting lists for public housing and Section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?**

HCVP (waiting list of 202 families):

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

Multi-Family (waiting list of 564 families):

- Extremely-Low Income – Comprises 58% of families on the waiting list.
- Families with Children – Comprises over 50% of families on the waiting list. (NMHC was unable to extract the exact data due to system errors)
- Elderly Families – Comprises 15% of families on the waiting list.
- 2 Bedroom Units – Comprises 77% of requested unit size.
- 3 Bedroom Units – Comprises 11% of requested unit size.
- Multi-Family Program’s Participant Average Income – \$6,853 Note: Data was extracted from WinTen2 System

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

increased recently from 150 applicants to 500 applicants before mandatory closing of the waiting list due to the high level of demand (HCVP). The Multi-Family Program continues to accept applications.

### **How do these needs compared to the housing needs of the population at large**

#### **Discussion:**

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

## NA-40 Homeless Needs Assessment – 91.305(c)

### Introduction:

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

### Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	884	2	884	0	0	90
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	0	0	0	0	0	0
Chronically Homeless Individuals	0	0	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Veterans	0	0	0	0	0	0
Unaccompanied Child	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

**Table 26 - Homeless Needs Assessment**

PIT Count 2020, NMHC is unable to determine all other data, which indicates a -0-

**Data Source Comments:**

Indicate if the homeless population is: Partially Rural Homeless

**Rural Homeless Needs Assessment**

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	0	0	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	0	0	0	0	0	0
Chronically Homeless Individuals	0	0	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	0	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

**Table 27 - Homeless Needs Assessment**

PIT Count 2020, NMHC is unable to determine all other data, which indicates a -0-

**Data Source Comments:**

**For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction:**

Data is unavailable for the CNMI

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

Data is unavailable for the CNMI

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
White	0	0
Black or African American	0	0
Asian	0	0
American Indian or Alaska Native	0	0
Pacific Islander	0	0
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
Hispanic	0	0
Not Hispanic	0	0

Data Source  
Comments:

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

NMHC does not track the veteran status in the housing assistance programs, particularly the Section 8 Housing Choice Voucher and the Multifamily Program, as there are no veteran preference; however, through the HESG Program, since Fiscal years 2016 to 2020 (October 1, 2016- September 30, 2020), of the total 41 families who have requested for assistance, were eligible and availed of the program, NMHC assisted 1 family with a veteran household member. (Data was extracted from HMIS). There are currently no veterans and a total of 360 families on the HESG-HP waiting list, and 18 individuals on the HESG-RRH waiting list. Veteran status was not collected in the PIT count. In the most recent PIT count, conducted on January 2020, there were 174 households in the unsheltered population with *at least one adult and one child in the household* (comprising 884 persons) were in need of housing assistance. There were 2 households, composed of one person each, that were in need of housing assistance. In addition, there were a total of 156 households *with only adults* (comprising 321 persons) in need of housing assistance. In the Section 8 HCVP Program, as of March 2021 PIC report, of the 202 families on the waiting list, approximately 16% are families with children (ages 0-6 years old). As with the Multi-Family Program, of the 562 families on the waiting list, there are a total of 322 children (0-6 years old); however, NMHC was unable to extract the number of households that correlates to this data. (Data extracted from WinTen2 System)

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

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

## **Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

Comparison between 2019 and 2020 PIT Count conducted on the islands of Saipan, Tinian, and Rota:  
2019 Unsheltered Population: 500 households, 1,787 persons

2019 Sheltered Population: 19 households, 20 persons

2020 Unsheltered Population: 330 households, 1,205 persons

2020 Sheltered Population: 2 households, 2 persons

The number of homeless households decreased by approximately 36%, and the number of persons decreased by nearly 33%. The decrease is due to the various federal programs, particularly FEMA, which provided rental assistance and other financial assistance to families who endured the catastrophic damages that Super Typhoon Yutu caused to the CNMI. Close to 5,000 homes were impacted, leaving families to live in FEMA-provided tents or continue to reside in their damaged residence which was not suitable for habitation. Starting FY 2019 to date, impacted families either availed of FEMA or SBA assistance or self-financed the rehabilitation/reconstruction of their homes. The Pacific Islander population, mostly comprised of citizens of the Federated States of Micronesia and indigenous Chamorro/Carolinian ethnicity, make up a majority of the homeless or at-risk population. Although some families still live in the tents, there has been a significant increase in rental assistance programs through US Treasury, HUD, and non-profit organizations that serve as options for the families to avail of. Disaster Recovery Data Extracted from the CNMI's CDBG-DR Action Plan: Pre-storm, there were approximately 300 homeless households in the Commonwealth. Following the storms, this number surged to over 500 homeless households, mainly due to the loss and damage to the housing stock. The Commonwealth of the Northern Mariana Islands Homeless Coalition was established in 2017, which included the creation of the CNMI Homelessness Coalition Board. Initially, the board was comprised of representatives from the Division of Youth Services, Karidat Social Services, Salvation Army, Division of Youth Affairs, and the Northern Marianas Coalition Against Domestic and Sexual Violence. A Point-In-Time (PIT) homeless count was conducted in 2017, 2018, 2019, and 2020. In 2017, the count resulted in approximately 100 homeless individuals. In 2018 this number was 687. The most recent official PIT count in 2019 resulted in a significant increase in the number of persons that are homeless. There were 1,384 persons (2 emergency sheltered and 1,382 unsheltered). To support and address homelessness, NMHC administers

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

**Discussion:**

## **NA-45 Non-Homeless Special Needs Assessment – 91.305 (b,d)**

### **Introduction**

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

### **Describe the characteristics of special needs populations in your community:**

**Elderly: 62 yrs and older:** HUD defines an elderly to be an individual who is 62 years and older; however, the CNMI Census 2010 data tallies the population for 60 years and older. Based on such data, of the total population 60 years and older, 16% are below the poverty level, and 19% of the population have a disability. There was also a 59% increase in householders whose age ranged from 65-74 years old in renter-occupied units, while there was a 29% increase in householders within the same range in owner-occupied units. As with the elderly population, for those ages 75-84, there was a 50% increase in householders since 2000 and a 31% increase for those 85 and over in owner-occupied units. For the renter-occupied units, there was an increase of 36% increase in householders ages 75-84, and a 50% increase in householders ages 84 and over. **Persons with Alcohol or Other Drug Addiction:** The most recent data for FY 2019 gathered from the Community Guidance Center of the Department of Public Health that during the year, a total of 109 individuals were identified to have alcohol or other drug addiction. See Appendix F, Tables 1 and 2. **Persons with Disabilities:** Of the total civilian non-institutionalized population, 5% of adults 18 years and older have a disability and 1% of children under the age of 18 are disabled. Of the total civilian non-institutionalized population who are 65 years and older, 1% have a disability. According to the 2010 U.S. Census for CNMI, only 42% of disabled adults are employed while 83% of non-disabled adults are working. The PIT count conducted in 2019 identified 25 households who were chronically homeless. **Persons with Disabilities Segregated by Category,** See Appendix F, Table 3. **Persons with HIV/AIDS:** Cumulatively, there have been 33 persons diagnosed with HIV in the CNMI since 1997. (Data collected from the Communicable Disease Division of the Department of Public Health). **Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking** The most recent data for FY 2019 was gathered from the Guma Esperansa Domestic Violence Shelter which provides shelter for victims of domestic violence and sexual assault. In CY 2019, there were 68 victims of domestic violence, 2 victims of sexual assault, 1 victim of human trafficking. In total, there were 80 secondary victims. There were a total of 2,683 bednights in Calendar Year 2019. As for the transitional housing program, Get Hope, specifically for victims of domestic violence, sexual assault, and dating violence, since the program's inception in 2017, the Guma Esperansa Shelter served approximately 38 families who spent close to 30,000 bed nights altogether. The Get Hope program

provides housing assistance specifically for victims for a period of up to (2) years. As a result of the Get Hope Program, the number of shelterees decreased by 51% from 2018.

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

#### Persons with HIV/AIDS and Their Families

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

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

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

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

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

**If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))**

#### **Discussion:**



## **NA-50 Non-Housing Community Development Needs - 91.315 (f)**

### **Describe the jurisdiction's need for Public Facilities:**

- To acquire, construct, or rehabilitate facilities for low-moderate income communities and special needs populations such as sports and recreational facilities, community center facilities that improve services to the general public and youth centers.

### **How were these needs determined?**

The CNMI addresses the needs of these low/moderate income areas by acquiring, constructing, or rehabilitating facilities that will benefit the low-mod income population. As stated earlier, of the CNMI's total population, 84.5% are low-mod income. Over the last five years, the CNMI has funded several public facilities and improvement projects that served particularly the youth of the CNMI through the rehabilitation of parks, rehabilitation of community center and youth center facilities, and have also funded the Department of Fire and Emergency Medical Services through the purchase of a fire truck and high pressured pumps for a fire station (located in heavily populated low-income neighborhoods). In total, the CNMI invested over \$2M in CDBG funds to meet the needs of low-and moderate-income neighborhoods.

### **Describe the jurisdiction's need for Public Improvements:**

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

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

funding is needed to address infrastructure and mitigation needs; therefore, priority projects had to be selected. The FEMA Public Assistance is the best available data set to determine infrastructure needs after Typhoon Mangkhut and Super Typhoon Yutu. Significant damage occurred to all areas and the following offices, authorities, and other entities submitted projects totaling over \$680 million in needed funds. CDBG-DR will also cover the 10% local match of the approximate public assistance cost and resiliency is 15 percent of the 10% local match cost (not including Debris Removal and Emergency Protective Measures). The CNMI's FEMA cost share is estimated at around \$23M.

### **How were these needs determined?**

These needs were determined through a needs assessment conducted by FEMA after Typhoon Mangkhut and Super Typhoon Yutu. The Office of the Governor and its departments, CUC, CPA, CHCC as well as the mayors of Saipan, Tinian, and Rota identified public facilities and infrastructure that required repairs or replacements.

### **Describe the jurisdiction's need for Public Services:**

There is a wide-ranging need for services to promote and protect the health, safety, moral, and welfare of the residents living in the villages of Saipan. The services include after-school and summer programs for the youth, public service projects that improve fire and emergency medical services, workforce development training to address the low-income population, other homeless programs for the special needs population, transitional housing programs, supportive housing programs, programs particularly for veterans, and programs that promote healthy living through encouragement to grow fresh produce in community gardens.

### **How were these needs determined?**

The need for public services is evident in the CNMI as there are no supportive housing programs, no transitional housing programs, limited homeless programs, limited programs that promote healthy lifestyles, and limited programs particularly for the youth and veterans. The need was also determined from various consultations with the Legislature, non-profit organizations, the public sector, and the community at-large.

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

In the CNMI, extremely low income and very low-income households are experiencing the most severe housing problems. The Migrant Workers now comprise the largest share of households and have a substantial impact on the availability, adequacy and affordability of rental housing. However, alien households are especially transient and they are not eligible for direct rental assistance and homeownership programs such as those provided by NMHC through the Section 8 and the HOME Loan Programs. Therefore, the focus of housing problems and solutions must be directed at indigenous households, CNMI born Chamorros and Carolinians. As such, it can be foreseen, that by aiding this major segment of the population to reach decent and affordable homeownership, the decent and affordable rental housing will filter-down to the Migrant households. Most elderly, homeless and persons with special needs are living with indigenous family households, and therefore are counted among family households needing housing assistance due to low incomes and physically inadequate housing conditions. Approximately 55 percent of extremely low-income and 35 percent of low-income owner-households with mortgages reported excessive monthly housing cost burden. Other owners with a mortgage did not experience excessive cost burdens to a significant degree. It is estimated that 200 low-income owner-occupant households are currently experiencing excessive monthly housing cost burdens, due to mortgage payments and high utility costs. About 25 percent of extremely low-income and 20 percent of low-income renter households paid more than 30 percent of their incomes toward gross rent. However, about half of these lower income non-owner households benefited from occupying units without payment of cash rent. Most owner-occupant households in the CNMI, regardless of income, suffered from overcrowded to severely overcrowded housing conditions, with an average household size of 4.15 persons. While also experiencing overcrowded housing conditions, renter households experienced less overcrowding than owner-occupants did. About 40 percent of renter households experienced overcrowding and 20 percent experienced severe overcrowding. As with owner-occupants, the cause was not dependent on income as much as the number of large households. The extremely low and low-income renters experience higher rates of overcrowding; over 40 percent compared to about 35 percent for moderate and middle income renters. The CNMI, while having one housing market, has four distinct groups of housing consumers with different needs, resources and opportunities. Migrant workers mostly from Asia are the largest group, representing about 70 percent of all renter occupied households and 15 percent of owner occupied households. The next largest segment of housing consumers is the indigenous Chamorros and Carolinians of CNMI descent. They currently represent about 45 percent of the overall housing market and have the most access to homeownership. Chamorro and Carolinians, as CNMI descendants, are eligible under CNMI law to own land fee simple, and are further encouraged into homeownership through the CNMI Village Homestead Program. While CNMI indigenous housing consumers have experienced growth in household income, almost half of

these households are low-income to extremely low-income. The overall CNMI Median Family Income in 2020 according to the U.S. Census was \$31,362.

**\*\*\*Specific data on the percentage of families with incomes below \$15,000 is not directly available in the released census data\*\*\*.** And, 33 percent, or approximately 3,600 are families with income below \$15,000.

## MA-10 Number of Housing Units – 91.310(a)

### Introduction

The tables below reflect that a majority of the residential properties are 1-unit detached structure with 3 or more bedrooms.

### All residential properties by number of units

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

**Table 30 – Residential Properties by Unit Number**

Data Source Comments: US Census Bureau Data for the CNMI, 2010

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	63	1%	1,306	11%
1 bedroom	476	10%	3,966	34%
2 bedrooms	1,411	31%	3,726	32%
3 or more bedrooms	2,587	57%	2,500	22%
<b>Total</b>	<b>4,537</b>	<b>99%</b>	<b>11,498</b>	<b>99%</b>

**Table 31 – Unit Size by Tenure**

Data Source Comments: US Census Bureau Data for the CNMI, 2010

**Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.**

There are approximately 427 units that are currently in use and are assisted with federal, state, and local programs. These units consist of CNMI's Housing Choice Voucher Program and Multi-Family Program, and ESG. These programs assist individuals and families with extremely-low to low-incomes with the ESG program targeting folks who are homeless.

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

The Northern Marianas Housing Corporation (NMHC) is the Public Housing Agency (PHA) in the CNMI. Under the Section 8 Housing Assistance Payments Program – New Construction – NMHC owns and operates a total of 132 units throughout the following four (4) housing project sites in the CNMI: Mihaville Estates (Saipan) - 48 Units; Koblerville Estates (Saipan) - 34 Units; Tinian Broadway Estates – 20 Units; and Rota Blue Bay Homes – 16 Units Online and 14 Units Off-Line. Currently, there are only sixteen (16) online units at Rota Blue Bay Homes since fourteen (14) units had to be taken off-line due to deteriorating conditions of the units brought about by environmental factors based on the project site's close proximity to the ocean side on the island. NMHC is exploring options to address these units so that the agency may initiate action to bring the fourteen (14) off-line units back online to regain a total of 132 units. The 118 units remain on-line and are well-maintained.

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

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

**Describe the need for specific types of housing:**

At present, NMHC has 374 approved Voucher Choice units and 132 Project-Based New Construction units. These units are occupied 100% of the time throughout the program year. Applicants for housing currently wait 2-3 years before a unit can be identified for occupancy. This clearly demonstrates the continuing need for housing throughout the CNMI. NMHC has a waiting list of 600+ (as of March 2015 PIC Report) families in need of housing through the Section 8 Voucher Program. At present, NMHC has

374 approved Voucher Choice units and 132 Project-Based New Construction units. These units are occupied 100% of the time throughout the program year. According to the Census 2000 there are 9,506 renter-occupied units in the CNMI. The NMHC seeks to improve the quality of life for the elderly and individuals with disabilities, utilizing CDBG funding, through rehabilitation of their housing units to achieve compliance with the Section 504 and the Americans with Disabilities Act. Applicants for housing currently wait 2-3 years before a unit can be identified for occupancy. This clearly demonstrates the continuing need for housing throughout the CNMI. There is a great need for new home construction in the CNMI, activity has increased considerably in the past few years due to the availability of programs such as the HUD funded HOME Program. First-time homeowners have sought the HOME and CDBG-DR Programs for assistance in the construction of a new home or for the acquisition and repair of a residential dwelling unit. The demand for New Construction, and Acquisition and Repair assistance has shown a sharp increase in the past two years alone. Of the 1,990 CDBG-DR applications picked up, a total of 350 applications were received for new construction/acquisition and 117 applications were received for rehabilitation. It is clear that the CNMI is experiencing a demand for housing, especially from the low-income first-time homeowners.

## **Discussion**

In the CNMI, discussions about housing needs have highlighted the demand for specific types of residential properties to address various challenges.

1. **Affordable Rental Housing:** The CNMI has recognized the necessity for affordable rental units to accommodate low-income families and individuals. Developments are aimed to offer a range of unit sizes, including one-bedroom to four-bedroom units, to cater to diverse family structures.
2. **Homeownership Opportunities:** There is a concerted effort to promote homeownership among residents. The Northern Marianas Housing Corporation (NMHC) has partnered with the U.S. Department of Agriculture (USDA) to facilitate access to safe and affordable homes through programs like the Single Family Home Loan Program. This collaboration aims to assist individuals in buying, building, and repairing homes, thereby fostering community development and economic stability.
3. **Disaster Recovery and Resilience:** In response to natural disasters such as Typhoon Yutu and Typhoon Mangkhut, the CNMI has implemented the Community Development Block Grant - Disaster Recovery (CDBG-DR) Program. This program focuses on rehabilitating and reconstructing homes, developing new single-family units, and enhancing rental housing to build a more resilient housing stock. Projects under this initiative include the construction of multi-family units and the rehabilitation of existing rental properties to meet current standards.
4. **Infrastructure and Planning:** The CNMI's Physical Development Master Plan emphasizes the importance of infrastructure development in housing projects. It advocates for the creation of homestead subdivisions with adequate infrastructure, such as roads and utilities, to support residential communities. The plan also suggests developing typical house plans that are cost-effective and suitable for local families, considering future expansion possibilities.

The The CNMI's housing discussions underscore the need for a balanced approach that includes affordable rental housing, homeownership opportunities, disaster recovery efforts, and robust

infrastructure planning. By addressing these areas, the CNMI aims to meet the diverse housing needs of its residents and promote sustainable community development.

## MA-15 Cost of Housing – 91.310(a)

### Introduction

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

### Cost of Housing

	Base Year: 2000	Most Recent Year: 2010	% Change
Median Home Value	0	0	0%
Median Contract Rent	216	308	43%

Table 32 – Cost of Housing

Data Source Comments: US Census Bureau Data, CNMI 2000 and 2010

Rent Paid	Number	%
Less than \$500	6,271	0.0%
\$500-999	2,037	0.0%
\$1,000-1,499	374	0.0%
\$1,500-1,999	123	0.0%
\$2,000 or more	2,693	0.0%
<b>Total</b>	<b>11,498</b>	<b>0.0%</b>

Table 33 - Rent Paid

Data Source Comments: US Census Data for the CNMI, 2010

### Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	0	No Data

Number of Units affordable to Households earning	Renter	Owner
50% HAMFI	0	0
80% HAMFI	0	0
100% HAMFI	No Data	0
<b>Total</b>	<b>0</b>	<b>0</b>

**Table 34 – Housing Affordability**

Data Source Comments: No data available

### Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	393	422	515	715	897
High HOME Rent	590	633	773	1,126	1,346
Low HOME Rent	197	211	258	375	449

**Table 35 – Monthly Rent**

Data Source Comments: HOME Data

### Is there sufficient housing for households at all income levels?

It can be argued that there is insufficient housing in the CNMI for households across all income levels. Based on the 2010 statistics, it becomes clear that more than half of both small and large family households that fall in the 0- 30% and 30-50% AMFI are in greater need of public housing assistance. An estimated count of 7,000 of the CNMI’s small family households and 1,200 of large family households are considered at-risk as these households are the extremely low-income (0-30% AMFI) to the moderate-income families (>30% - 50% AMFI). Most of these extremely low-income families are struggling to make ends meet and to keep up with their mortgage or rental payments, let alone, to pay for high utility costs. As a result of this, families will tend to resort to available public housing assistance such as the Section 8 Multifamily Program or the Housing Choice Voucher Program (HCVP) as administered by NMHC. And, given that the wait list continues to increase for these programs, are true indicators that the supply does not meet the current demand for public housing in the CNMI. Further funding, planning, and implementation of programs may be needed in order to reach an equilibrium level where the at-risk, extremely-low and low-income families and households, can be adequately assisted and thereby preventing and minimizing the impact of homelessness in the CNMI.

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

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

The devastating effects of Super Typhoon Yutu have led to the increase in construction costs both in materials and labor. The CNMI is seeing a sharp increase in the cost to build new homes and rental housing. The shortage of skilled labor is still a problem as the local labor force through trainings offered by the Northern Marianas Technical Institute and other agencies is not enough to offset the loss of foreign skilled labor. The high cost of home construction is unaffordable for low to median households and there will be a reliance on grants and subsidies to make homeownership affordable.

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

The CNMI's Area Median Rent (AMR) as indicated by the 2020 U.S. Census is \$502 and is less than half of the Fair Market Rent (FMR) of \$786 as provided by HUD for the "Pacific Islands." It can be argued that the AMR is a better indicator of the rental rates for the CNMI as based on cost of living, family size, unit size, and household income for the area.

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

## **Discussion**

Low to moderate income families face many challenges when it comes to homeownership and rental housing. With the current housing market and the price of a new home, without grant or subsidy assistance, homeownership will be unattainable. The income or wages of these households are not enough to cover mortgage, utilities, and household expenses. It could be said the same thing for affordable rental housing. Decent, safe, and sanitary rental housing rental rates are above the 30% of the households' monthly income thereby making it a rent burden for the low to moderate income families who do not have rental assistance.

## MA-20 Condition of Housing – 91.310(a)

### Introduction:

The CNMI finds that most owner-occupied and renter-occupied units were constructed between 1980-1999, 64% and 65% respectively. 11% of owner-occupied and 6% of renter-occupied housing were constructed before 1979 which would indicate the possibility of lead-based paint hazard. The CNMI is not included in the American Community Survey, and since the default data source is the ACS, the CNMI is unable to input information in the tables below.

### Definitions

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

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	0	0%	0	0%
With two selected Conditions	0	0%	0	0%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	0	0%	0	0%
<b>Total</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>

Table 36 - Condition of Units

Data Source: 2011-2015 ACS

## Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	0	0%	0	0%
1980-1999	0	0%	0	0%
1950-1979	0	0%	0	0%
Before 1950	0	0%	0	0%
<b>Total</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>

**Table 37 – Year Unit Built**

Data 2011-2015 CHAS  
Source:

## Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	0	0%	0	0%
Housing Units build before 1980 with children present	0	0%	0	0%

**Table 38 – Risk of Lead-Based Paint**

Data 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)  
Source:

## Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

**Table 39 - Vacant Units**

Data 2005-2009 CHAS  
Source:

## **Need for Owner and Rental Rehabilitation**

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

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

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

### **Discussion:**

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

## MA-25 Public and Assisted Housing – (Optional)

### Introduction:

### Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available				374			0	0	0
# of accessible units									

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

Table 40 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

### Describe the supply of public housing developments:

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

The Northern Marianas Housing Corporation (NMHC) is the Public Housing Agency (PHA) in the CNMI. Under the Section 8 Housing Assistance Payments Program – New Construction – NMHC owns and manages the following four properties:

#### (4) housing developments/project sites in the CNMI:

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

### Describe the Restoration and Revitalization Needs of public housing units in the jurisdiction:

- Rota Blue Bay Homes (16 Units Online and 14 Off-Line) – Renovation/Maintenance of existing units and site improvements. Efforts are being taken to explore opportunities to relocate the

project site from Songsong Village to Sinapalo Village; NMHC is exploring opportunities to leverage funds to initiate the relocation process. NMHC is also looking into applying for grants to rehabilitate all 30 units.

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

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

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

**Discussion:**

## MA-30 Homeless Facilities – 91.310(b)

### Introduction

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

### Facilities Targeted to Homeless Persons

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

**Table 41 - Facilities Targeted to Homeless Persons**

**Data Source Comments:** Data from the Division of Youth and Guma Esperansa Domestic Violence Shelter

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

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

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

## MA-35 Special Needs Facilities and Services – 91.310(c)

### Introduction

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

### **To the extent information is available, describe the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

Persons with Disabilities: Of the total civilian non-institutionalized population, 5% of adults 18 years and older have a disability and 1% of children under the age of 18 are disabled. Of the total civilian non-institutionalized population who are 65 years and older, 1% have a disability. According to the U.S. Census Bureau, 2010 CNMI Census, only 42% of disabled adults are employed while 83% of non-disabled adults are working. According to HUD, a chronically homeless individual or in the case of a family household, an adult head of household (or if there is no adult in the family, a minor head of household) who (i) is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and (ii) has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years; and (iii) can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Right Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability. The CNMI has not conducted a PIT survey and therefore, cannot input any data with regards to the # of chronically homeless persons in the CNMI. Persons with HIV/AIDS and Their Families The Point Prevalence of persons living with HIV in the CNMI today is 33. Cumulatively, there have been 30 persons diagnosed with HIV in the CNMI since 1997. (Data collected from the Communicable Disease Division of the Department of Public Health). Many of the diagnosed individuals live with family who help take care of their needs. Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Data gathered from Guma Esperansa Domestic Violence Shelter, reflects a total of 384 women and 1 man, with 392 children who were victims of domestic violence, Sexual Assault and Human Trafficking were served (from years 2015-2018). This is a significant number with relation to the small population of the CNMI, compared to other island jurisdictions. The Guma Esperansa Shelter provides shelter, food, and supportive services for victims, and the CNMI Coalition Against Domestic Violence is a non-profit entity which works to fulfill this mission by addressing the issues of domestic violence and sexual assault through community outreach efforts, providing training to service providers and responders, nurturing meaningful partnerships with groups or individuals, as well as working to

create social change. Those who have exited the shelter have sought housing assistance from the Section 8 programs and Karidat Social Services' short-term rental assistance programs.

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

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

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

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

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

As an entitlement grantee, the CNMI will undertake the activities mentioned above with ESG and HOME funds during the First Year Action Plan.

## **MA-40 Barriers to Affordable Housing – 91.310(d)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

Minimum Wage & Employment : The CNMI's current minimum wage is \$7.25 per hour. The current minimum wage does not allow room for families to build or acquire an affordable home. The high cost of utilities, food, fuel, and other commodities are preventing families from affordable housing. Many households that cannot afford to obtain a decent home choose to live in substandard homes that do not have the proper sanitary facilities and adequate number of rooms to accommodate their household size. Developers attribute this increase to several factors including the rising cost of labor, materials, land, and utilities. Construction Costs: A significant barrier to producing more affordable housing is the rising cost of development and the limited foreign labor capacity in the CNMI. The CNMI being geographically located in typhoon alley calls for stringent building codes to withstand severe weather, with wind gusts above 200 MPH as demonstrated by Super Typhoon Yutu. According to NMHC's Asset Management Division, the average cost of construction is \$191,952 (CMU block concrete foundation), which has nearly doubled from 2015. Labor costs have directly impacted the cost of construction: The provisions of US Public Law 110-229 which phases out the CNMI's non-resident labor pool, commonly referred to as a "Commonwealth Worker" or "CW", have created an unprecedented labor quandary which has negatively impacted the CNMI's private sector. Coupled with this mandated reduction of foreign sourced labor is a significantly small populace resulting from out migration prompted by the jurisdiction's previous economic downturn. According to the 2010 CNMI Census, the CNMI's population declined nearly 22% from the previous decade, further shrinking the available labor pool required to support a recovering economy. According to the Government Accountability Office's (GAO) report, the elimination of the CNMI's non-resident labor pool would result in a maximum 62% decrease in Gross Domestic Product (GDP). Given the current and projected demand for labor, the size the CNMI's domestic workforce and the uncertainties of continued extensions of the CW program, it is critical for the CNMI to properly plan and strategize its economic course. Challenges faced by Persons with Disabilities: NMHC in collaboration with the Northern Marianas Protection and Advocacy System, Inc. (NMPASI) and Council for on Developmental Disabilities (CDD) identified the challenges encountered by individuals with disabilities. People with disabilities are suggesting that the program be brought to them. The following challenges were noted by the their case manager at NMPASI: income criteria should be adjusted to reflect the current cost of living in the CNMI, timeframe to be given for people who are on the program, increased utility allowance to reflect the high cost of utilities in the CNMI, and provide home service to individuals with disabilities. The Council on Developmental Disabilities has identified the following barriers that persons with disabilities are faced with: application documents are not accessible for visually impaired, need to provide transitional homes and expand rental housing for those who are homeless, in addition to the waiting list (for Section 8 program) being too long, and the need to enforce Fair Housing Act of 1998. In addition to the Barriers to Affordable Housing above, NMHC completed its Analysis of Impediments to Fair Housing on July 27, 2020. See Appendix G for the most recent Analysis of Impediments.

## MA-45 Non-Housing Community Development Assets -91.315(f)

### Introduction

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

The Commonwealth of the Northern Mariana Islands (CNMI) faces unique challenges and opportunities in its economic and community development landscape due to its geographic isolation, limited land availability, and reliance on a small number of economic sectors.

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	472	0	2	0	-2
Arts, Entertainment, Accommodations	5,519	0	23	0	-23
Construction	1,786	0	7	0	-7
Education and Health Care Services	3,085	0	13	0	-13
Finance, Insurance, and Real Estate	1,064	0	4	0	-4
Information	496	0	2	0	-2
Manufacturing	689	0	3	0	-3
Other Services	2,553	0	10	0	-10

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Professional, Scientific, Management Services	1,974	0	8	0	-8
Public Administration	2,414	0	10	0	-10
Retail Trade	2,645	0	11	0	-11
Transportation and Warehousing	1,067	0	4	0	-4
Wholesale Trade	700	0	3	0	-3
Total	24,464	0	--	--	--

**Table 43- Business Activity**

Data Source Comments: U.S. Census 2010, CNMI - Industry

## Labor Force

Total Population in the Civilian Labor Force	27,968
Civilian Employed Population 16 years and over	24,826
Unemployment Rate	11.20
Unemployment Rate for Ages 16-24	28.90
Unemployment Rate for Ages 25-65	9.20

**Table 44 - Labor Force**

Data Source Comments: US Census 2010, CNMI - Labor Force

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

**Table 45 – Occupations by Sector**

Data Source Comments: US Census 2010, CNMI- Occupations

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	20,994	91%
30-59 Minutes	1,999	9%

<b>Travel Time</b>	<b>Number</b>	<b>Percentage</b>
60 or More Minutes	69	0%
<b>Total</b>	<b>23,062</b>	<b>100%</b>

**Table 46 - Travel Time**

**Data Source Comments:** US Census 2010, CNMI- Travel Time to Work for population 16 yrs and older

**Education:**

**Educational Attainment by Employment Status (Population 16 and Older)**

<b>Educational Attainment</b>	<b>In Labor Force</b>		<b>Not in Labor Force</b>
	<b>Civilian Employed</b>	<b>Unemployed</b>	
Less than high school graduate	0	0	0
High school graduate (includes equivalency)	0	0	0
Some college or Associate's degree	0	0	0
Bachelor's degree or higher	0	0	0

**Table 47 - Educational Attainment by Employment Status**

**Data Source Comments:**

**Educational Attainment by Age**

	<b>Age</b>				
	<b>18–24 yrs</b>	<b>25–34 yrs</b>	<b>35–44 yrs</b>	<b>45–65 yrs</b>	<b>65+ yrs</b>
Less than 9th grade	109	315	552	1,129	554
9th to 12th grade, no diploma	1,010	815	1,023	1,178	171
High school graduate, GED, or alternative	1,672	2,377	4,007	5,309	370
Some college, no degree	0	0	0	0	0
Associate's degree	1,156	1,948	2,998	3,063	208
Bachelor's degree	168	1,241	1,908	2,085	149

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Graduate or professional degree	17	229	335	524	114

**Table 48 - Educational Attainment by Age**

**Data Source Comments:** U.S. Census 2010, CNMI. Indicated a -0- in Some college, no degree. For the Associates Degree row, data for "some college, or Associates Degree" is inputted.

### Educational Attainment – Median Earnings in the Past 12 Months

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

**Table 49 – Median Earnings in the Past 12 Months**

**Data Source Comments:** US Census 2010, CNMI

### Based on the Business Activity table above, what are the major employment sectors within the state?

The major employment sectors within the jurisdiction are in construction, installation, maintenance and repair, building and grounds cleaning, food preparation and serving within the private sector.

### Describe the workforce and infrastructure needs of business in the state.

The CNMI business community continues to rely heavily on a foreign labor workforce. In its latest report on the CNMI's workforce trends, the U.S. Government Accountability Office indicated that in 2023, the CNMI experienced a decrease in the overall share of foreign workers and a steady increase in the overall share of U.S. workers in the total workforce of the Commonwealth. However, jobs held by foreign workers are still in high demand. Based on job vacancy announcement data trends, occupations in construction & extraction, installation, maintenance & repair, building and grounds cleaning, and food preparation and serving remain to be the most sought after by private sector employers.

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

The Northern Mariana Islands are experiencing significant economic challenges, primarily driven by external factors such as natural disasters, the COVID-19 pandemic, and changes in the tourism industry.

1. Tourism Sector Challenges. The CNMI's economy heavily relies on tourism, constituting over 20% of local employment. The aftermath of typhoon disasters (2015-2018) and the COVID-19 pandemic have severely impacted the tourism industry, with annual visitor arrivals plummeting from 653,150 in 2017 to only 5,365 in 2021. While it is on an upward trend, it is still a far cry from 2017 numbers. Further, the CNMI government has taken a strategic shift away from the Chinese tourism market due to geopolitical tensions which has further complicated recovery efforts, presenting challenges in restoring visitor arrivals. Additional complications to this situation are a 90% rise in CPA fees which has begun to affect the commitment of airlines to maintain the CNMI route.

2. Economic Downturn and Revenue Decline. The economic downturn has led to a decline in government revenue collections, dropping from \$224 million in FY 2018 to \$164 million in FY 2023. Because of this, austerity measures, including a reduction in work hours for government offices and personnel, have been implemented since April 2023, with an increase to a 10-hour cut per pay period in October of FY2024.

Notably, there is a decline in business license applications by 15% from 2022 to 2023 which suggests a challenging environment for businesses, leading to potential closures and job losses.

3. Employment Challenges: Prior to the pandemic, the 2020 U.S. Census measured the CNMI the unemployment rate at 14.1%. It is anticipated to be higher today based on our economic situation, but the CNMI government does not have a regular survey of unemployment to refer to for more updated data. According to the U.S. Government Accountability Office CNMI Ratio Reports, U.S. workers constitute for at least half of the CNMI's employed workforce between 2018 and 2022. The number of CW-1 permits allowed, continues its march towards 0 by 2029. Notably, during the pandemic years, the CW permits issued per year have been significantly under the permit allowances, indicating a decrease in the demand and employment of foreign workers.

4. Infrastructure and Workforce Development Needs: With several Federal projects and programs in the CNMI poised to launch and expand development in the areas of broadband, solar energy, and housing infrastructure; having a skilled workforce is urgently needed to be able to bring these projects to fruition and completion. Economic activity will be great for the economy, but only if we have a skilled workforce in place to meet the goals and deadlines of all the various projects ahead.

The economic challenges outlined above necessitate a comprehensive approach to address workforce development, business support, and infrastructure needs. Financial assistance is urgently required to sustain the economy during this transitional period, especially with the strategic shift in the tourism sector. Policies promoting business resilience, attracting investments, and fostering workforce development are essential to navigate the economic downturn.

In summary, the CNMI is facing a complex economic situation, and addressing the challenges will require a coordinated effort involving government initiatives, private sector resilience, and strategic planning to revive the tourism industry and ensure sustainable economic growth.

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

While the Department of Labor does not collect job skills and education data of the current workforce to determine compatibility with employment opportunities, existing workforce data suggests that the two (skills/education of the workforce and employment opportunities) do not align for U.S. workers. Disclaimer: the department only collects employment data in the private sector workforce of the Commonwealth.

Employment opportunities: Based on job vacancy announcement data trends, the jobs that are the most sought after by CNMI employers have remained the same for several years. These occupations are in construction & extraction, installation, maintenance & repair, building and grounds cleaning, and food preparation/serving. See below:

Occupational Group	Job Openings
Construction and Extraction	8,093
Installation, Maintenance & Repair	3,339
Building and Grounds Cleaning	1,866
Food Preparation & Serving	1,643

Actual employment: According to workforce reports gathered from CNMI employers in the first to fourth quarters of FY 2023, foreign workers held more positions in installation, maintenance & repair, food preparation and serving, and building and grounds cleaning occupations. Those reports also indicate that U.S. workers held more positions in office and management support, management, and food preparation/serving occupations. See below:

Worker Type	Top 3 Occupations	Average No. Workers
U.S.	(1) Office & Admin Support (2) Management (3) Food Prep/Serving	(1) 777 (2) 717 (3) 683
Foreign	(1) Installation & Maintenance (2) Food Prep/Serving (3) Building & Grounds	(1) 1,143 (2) 583 (3) 432

The department administers the CW fund program and acknowledges the urgency to provide more funding to organizations that bolster the workforce through technical and trades training and education. The department has modified the CW fund program to align with the state’s workforce needs by providing more funding and resources to technical and trades institutions.

**Describe current workforce training initiatives supported by the state. Describe how these efforts will support the state's Consolidated Plan.**

The CNMI Department of Labor’s Workforce Investment Agency continues to build its local workforce through an array of programs and services that support the employment, education, and training of both job seekers and employers. Through innovative strategies, sector training initiatives, and wrap-around programs such as SKILLUP CNMI; the CNMI DOL WIA Division intends to build up the local workforce by providing access to a wide variety of training and employment opportunities. The CNMI DOL programs provide job seekers with the autonomy to expand their skills and increase their employability. These programs also provide business owners the resources to personalize training options for incumbent workers and trainees based on their business needs.

These programs are designed for those affected by the COVID-19 pandemic, and individuals facing social and economic inequities that the pandemic exacerbated- whether that is to enter, return to, or advance in high-quality jobs. One such program is the CNMI Registered Apprenticeship Program (RAP) which helps to upskill incumbent workers to further their career goals, becoming skilled workers that employers need across all industries. In particular, just with the Bipartisan Infrastructure Law (BIL) and the Broadband Equity, Access, and Deployment (BEAD) Programs alone, the CNMI can anticipate a high need for skilled workers across several industries to meet the goals and outcomes established by those programs.

The CNMI Department of Labor continues its efforts to support this expansion by collaborating with different organizations and institutions such as the CNMI Public School System (PSS), Northern Marianas College (NMC), Northern Marianas Technical Institute (NMTech), and various business groups, such as the Saipan Chamber of Commerce and the Hotel Association of the Northern Mariana Islands (HANMI). We also strive to strengthen our partnership with different government agencies to provide wrap-around

services and resources to support workers, such as the Commonwealth Office of Transportation Administration (COTA), the Office of Vocational Rehabilitation(OVR), and the Department of Community and Cultural Affairs(DCCA).

**Describe any other state efforts to support economic growth.**

## Discussion

## **MA-50 Needs and Market Analysis Discussion**

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

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

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

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

estimate, given the number of homestead applicants now estimated at over 4,000. The homeownership rate for indigenous ethnic groups will continue to increase in the next five years. Most, if not all, of these new homeowners and about 1,500 or about 50 percent of existing Chamorro and Carolinian owner-occupants will need housing loan assistance either for new housing construction or housing rehabilitation. On annual basis, it is estimated that about 50 percent of low-income new homeowners will need mortgage lending assistance.

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

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

### **Are there any community assets in these areas/neighborhoods?**

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

### **Are there other strategic opportunities in any of these areas?**

With the growing population in Kagman and its distance from many amenities, through the years, it has become the most developed. In the village, there is a hotel and golf resort, elementary, junior high, and high schools, a fire station, community center, community parks, several grocery stores, churches, an eye clinic, and a medical clinic. Since PY 2015, a total of four LIHTC housing projects have developed, with one pending, in the amount of \$37.9M, with an overall total of approximately 232 units, and are in close proximity with the villages of Kagman, Koblerville, and Dan Dan.

Disaster Recovery Data was extracted from the CDBG-DR Action Plan: Two of the three islands (Saipan and Tinian) are in a HUD identified "most impacted and distressed" area. FEMA and the local assessment

of unmet needs are the basis for the development and prioritization of recovery activities in the CNMI jurisdiction. Through these funds, the CNMI primarily intends to address unmet housing needs supported by infrastructure and economic development.

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

Adequate infrastructure including roads, utilities, port, and public facilities will be required to support the proposed housing programs for rehabilitation, reconstruction, and new construction.

Economic Revitalization activities help to create and retain jobs in the community, helping households stabilize their employment and/or by increasing their income. Workforce development as part of economic revitalization will provide local citizens with the training needed to become skilled workers thereby, allowing local citizens to attain lifelong workplace skills and to be competitive in the job market.

Long term recovery cannot be sustained without the combination of housing, infrastructure, and economic development activities.

CNMI housing programs will be complemented by a broad approach to infrastructure to help stabilize households and return families to re-establish communities.

Preparedness and mitigation measures considered for housing supported by infrastructure and economic development programs and projects will ensure residents of the Islands especially the Saipan and Tinian MID areas create safer and more resilient communities and neighborhoods post-storm.

## **MA-60 Broadband Needs of Housing Occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

### **Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

The CNMI recognizes the significant role broadband access plays in improving quality of life. From expanding educational opportunities to strengthening business connections and enhancing social interaction, reliable broadband has become essential. Given the CNMI's remote location in the Pacific, strong broadband infrastructure is especially critical.

During the 2020 COVID-19 Public Health Emergency, the CNMI Public School System (PSS) implemented a program to support underserved student residents. Broadband service providers, in collaboration with PSS, worked to meet community needs by identifying students and households with unstable, limited, or no internet access. This comprehensive effort aimed to "connect" students and teachers, ensuring equitable access to online learning—particularly for low- to moderate-income families.

It is important to note that the Northern Marianas Housing Corporation (NMHC) does not directly provide broadband access to its tenants.

The CNMI recognizes the vital role that broadband access plays in improving quality of life. Factors such as educational opportunities, business connectivity, and enhanced social interaction have all contributed to a growing understanding of the importance of reliable broadband. This infrastructure is especially critical for the CNMI, given its remote location in the Pacific.

During the 2020 COVID-19 Public Health Emergency, the CNMI Public School System (PSS) implemented a program to support underserved student residents. Broadband service providers collaborated with PSS to help address these connectivity gaps and meet the needs of the community.

### **Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.**

Broadband infrastructure is critical to the CNMI, especially due to its remote location in the Pacific. A reliable connection has proven essential during times of natural disasters, as demonstrated during Super Typhoon Yutu. That event highlighted just how vital dependable broadband service is for the community's resilience and recovery.

Broadband providers have shown a continued commitment to expanding infrastructure, supporting underserved populations, and improving services to keep pace with an increasingly digital world.

## **MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)**

### **Describe the jurisdiction's increased natural hazard risks associated with climate change.**

The Commonwealth of the Northern Mariana Islands (CNMI) is increasingly vulnerable to natural hazards intensified by the impacts of climate change. As a remote island jurisdiction in the western Pacific, CNMI faces significant risk from sea level rise, stronger and more frequent typhoons, prolonged droughts, extreme rainfall events, and coastal erosion.

#### **1. Typhoons and Storm Intensity:**

In recent years, the CNMI has experienced more frequent and severe tropical cyclones, most notably Super Typhoon Yutu in 2018. As climate change contributes to warmer ocean temperatures, storm systems gain more energy, resulting in stronger winds, heavier rainfall, and greater storm surge impacts. These events strain infrastructure, displace residents, and damage housing—particularly among vulnerable, low-income communities.

#### **2. Sea Level Rise and Coastal Erosion:**

Many CNMI communities are situated in low-lying coastal areas. Rising sea levels pose long-term threats to public infrastructure, housing, and freshwater sources. Coastal erosion worsens with each successive storm season, compromising both natural habitats and human settlements.

#### **3. Drought and Freshwater Scarcity:**

Climate change is disrupting rainfall patterns across the region. CNMI has seen an increase in the frequency and severity of droughts, reducing the availability of surface and groundwater. Limited freshwater access affects public health, agricultural productivity, and emergency preparedness.

#### **4. Flooding and Rainfall Extremes:**

Intense rainfall events have led to more frequent inland and flash flooding. The terrain and limited drainage infrastructure make many areas in CNMI susceptible to these sudden flood events, especially in urban and residential zones.

In response to these growing risks, the CNMI continues to update its **Hazard Mitigation Plan** in coordination with FEMA and other partners. This includes identifying vulnerable populations, integrating climate adaptation strategies into infrastructure planning, and strengthening disaster preparedness and recovery frameworks to build long-term resilience.

## **Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

Housing occupied by low- and moderate-income (LMI) households in the Commonwealth of the Northern Mariana Islands (CNMI) is significantly more vulnerable to natural hazard risks, which are increasingly intensified by climate change. This vulnerability stems from both the physical characteristics of the housing stock and the socioeconomic conditions of the residents.

### **1. Location-Based Vulnerability**

Many LMI households in the CNMI reside in flood-prone, low-lying coastal areas—locations that are often less desirable and more affordable, but inherently riskier. Analysis of hazard maps in CNMI’s **Hazard Mitigation Plan** and FEMA flood zones shows that communities such as those in Lower Base (Saipan), parts of San Jose (Tinian), and surrounding coastal villages are particularly exposed to typhoon storm surge and sea level rise. These areas often lack adequate drainage, which increases the risk of flooding during heavy rainfall events.

### **2. Housing Condition and Structural Vulnerability**

According to housing assessment data from the CNMI Office of Planning and Development and the 2020 Census, a significant portion of LMI housing stock is substandard—constructed with non-engineered materials, lacking adequate roofing, or not anchored to withstand high winds and seismic activity. Many homes remain unrepaired from previous disasters, such as Super Typhoon Yutu, due to limited access to financing or insurance. These structural deficiencies heighten the risk of displacement and long-term homelessness during and after extreme weather events.

### **3. Economic Constraints and Limited Adaptive Capacity**

LMI households often lack the financial resources to invest in disaster-resistant construction, elevate homes in flood zones, or relocate to safer areas. Many are renters, which further limits their control over improvements to housing resilience. This group also faces barriers to recovery assistance, including limited access to broadband, internet-reliant application systems, and language or literacy obstacles. These constraints reduce their ability to prepare for, respond to, and recover from climate-driven events.

### **4. Disproportionate Recovery Burden**

Findings from CNMI’s **Post-Disaster Needs Assessments** and recovery data from FEMA Individual Assistance programs indicate that LMI households are less likely to receive full assistance to repair damages and more likely to experience prolonged displacement. Temporary shelter options are limited in the CNMI, and public housing capacity does not meet demand following large-scale disasters.

LMI households in the CNMI face compounded vulnerabilities due to geographic exposure, poor housing quality, and limited financial capacity. Without significant investments in resilient infrastructure, housing retrofits, and equitable disaster preparedness, these populations will remain at disproportionate risk from climate-related hazards. Targeted mitigation planning and funding for resilience in LMI communities is critical to protecting lives and promoting long-term recovery.

# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

The CNMI Government continues to be the designated recipient of the U.S. Dept. of Housing and Urban Development (HUD) Community Planning and Development grant funds for the Commonwealth of the Northern Mariana Islands (CNMI). The Governor has delegated the NMHC, a local, autonomous, government agency, to administer HUD CPD funds to ensure compliance with grant regulations. This Annual Action Plan report documents the CNMI's proposed use of the U.S. Department of Housing and Urban Development (HUD) Community Planning and Development (CPD) funds for the Program Year Program Year (PY) 2025 equates to Fiscal Year 2026 (October 1, 2025 - September 30, 2026) to address priority needs and goals of the community for housing, services, and community facilities serving low and moderate income populations. These priority needs and goals are documented in the CNMI's draft 5-year plan, the Consolidated Plan PY2025-2029 (the ConPlan). The CNMI will pursue goals such as the funding of economic development projects to provide economic opportunities such as job creation or retention for low-mod income households. In addition through the ESG and HOME Programs, the CNMI will address the housing needs of low-income households by providing rental assistance through the ESG Program and home ownership and home rehabilitation opportunities through the HOME Program.

**PY2025** represents the first year of the draft ConPlan. The CNMI receives three entitlements. The CNMI is an annual recipient of entitlement funds and is eligible to compete nationally for use of the competitive grant funds. Entitlement grants include the Community Development Block Grant (CDBG), HOME Investment Partnerships Grant (HOME), and Emergency Solutions Grant (ESG) and Housing Trust Fund (HTF). Past performance is evaluated by a performance measurement system that gauges the goals, objectives, outputs and outcomes. The Community Planning and Development (CPD) program is substantially on schedule in achieving its stated goals and objectives. At the end of the program year, the CNMI completes a report reflecting the output data of the projects which is compiled with other projects in the Consolidated Annual Performance and Evaluation Report (CAPER) and input into HUD's Integrated Disbursement and Information System (IDIS). In its first ConPlan year, the CNMI proposes to utilize CDBG funds to rehabilitate the Emergency Shelter, Expansion and Rehabilitation of the Tanapag Youth Center, Expansion and Rehabilitation of the Sinapaolo Youth Center, and the Rehabilitation of Miguel (Tan Ge') Pangelinan Field. ESG funds are proposed to continue providing financial assistance to persons experiencing homelessness or are most at-risk of becoming homeless with a primary focus on rapid re-housing. The CNMI continues to identify projects that will greatly contribute to the welfare of individuals and families in the community with a focus on low-and moderate-income persons.

## SP-10 Geographic Priorities – 91.315(a)(1)

### Geographic Area

Table 50 - Geographic Priority Areas

1	<b>Area Name:</b>	Rota
	<b>Area Type:</b>	U.S. Territory
	<b>Other Target Area Description:</b>	U.S. Territory
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	
	<b>Include specific housing and commercial characteristics of this target area.</b>	
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	
	<b>Identify the needs in this target area.</b>	
	<b>What are the opportunities for improvement in this target area?</b>	
	<b>Are there barriers to improvement in this target area?</b>	
2	<b>Area Name:</b>	Saipan
	<b>Area Type:</b>	U.S. Territory
	<b>Other Target Area Description:</b>	U.S. Territory
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	
	<b>Include specific housing and commercial characteristics of this target area.</b>	

	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	
	<b>Identify the needs in this target area.</b>	
	<b>What are the opportunities for improvement in this target area?</b>	
	<b>Are there barriers to improvement in this target area?</b>	
<b>3</b>	<b>Area Name:</b>	Tinian
	<b>Area Type:</b>	U.S. Territory
	<b>Other Target Area Description:</b>	U.S. Territory
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	
	<b>Include specific housing and commercial characteristics of this target area.</b>	
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	
	<b>Identify the needs in this target area.</b>	
	<b>What are the opportunities for improvement in this target area?</b>	
	<b>Are there barriers to improvement in this target area?</b>	

**General Allocation Priorities**

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

The CNMI does not allocate investments based solely on geographical location. The greatest, beneficial impact is considered when evaluating project proposals. Since the CNMI’s population is smaller than most island territories, projects will impact the CNMI community entirely. Although projects are situated in specific villages, residents from other areas of the island will utilize the project as well. Due to the islands’ land mass (Saipan, Tinian, and Rota) and population, each municipality’s residents are in close proximity to recreational facilities, public services, and public facilities, in general. Based on the Census 2010 low-mod data by the American Community Survey, Saipan’s population is 47,066 of which 39,789 or 84.5% are low-mod income. Tinian’s population is 2,444 of which 2,076 or 84.9% are low-mod income.

Rota's population is 2,802 of which 2,367 or 84% are low-mod income. It is understood that the low-mod percentage of the project beneficiaries should be more than 51%. A needs assessment is also conducted during the project evaluation process. Activities are targeted for geographic service areas where the need is greatest and where the greatest impact will be.

## SP-25 Priority Needs – 91.315(a)(2)

### Priority Needs

Table 51 – Priority Needs Summary

<b>1</b>	<b>Priority Need Name</b>	Non-housing Community Development
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Individuals Families with Children Mentally Ill Victims of Domestic Violence Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	<b>Geographic Areas Affected</b>	U.S. Territory U.S. Territory U.S. Territory
	<b>Associated Goals</b>	Infrastructure Improvements Job Creation/Retention Public Services Public Facilities and Improvements Community Enhancement Disaster Recovery
	<b>Description</b>	Non-housing community development consists of activities that encompass the acquisition, rehabilitation, or construction of structures for use as public facilities, improvements to the public infrastructure and projects that will enhance the community.

	<b>Basis for Relative Priority</b>	The CNMI continues to identify the need for non-housing community development such as improvements to village recreational facilities or the creation of such facilities in low-and moderate-income neighborhoods, improvements or new construction to safety facilities such as fire stations, promotion of energy efficiency in public facilities due to the significant utilities' cost in the CNMI, and improvements to the islands' infrastructure, such as the repair of roads and drainage systems that will support housing and enhance resiliency against future disasters.
2	<b>Priority Need Name</b>	Homelessness
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence
	<b>Geographic Areas Affected</b>	U.S. Territory U.S. Territory U.S. Territory
	<b>Associated Goals</b>	Emergency Shelter/Transitional Housing Promote Fair Housing Provide services to the homeless population Disaster Recovery

	<b>Description</b>	<p>First, a priority need of the CNMI is to continue the administration of the ESG program which provides financial and housing relocation and stabilization assistance to literally homeless and at risk of homelessness individuals. In addition, the CNMI plans to conduct a point in time survey of the homeless population (including those with special needs) in order to apply for the Continuum of Care Program to effectively address the homeless needs in the CNMI. This priority need addresses a variety of activities that will contribute to the prevention of homelessness in the CNMI. Although the literally homeless population is quite small compared to the island of Guam, the problem still exists, and it is NMHC’s goal to ultimately end this problem before it becomes difficult to control. The CNMI will focus on activities that serve special needs populations that include supporting the operations of facilities providing services, supporting the work of organizations that sustain living environments and enhance the quality of life for special needs populations, and support the work of other service providers addressing the needs of such population.</p>
	<b>Basis for Relative Priority</b>	<p>There are close to 302 households, comprising 1,207 persons who were counted and identified as homeless or at risk of homelessness. In addition, there are about 202+ households on the Section 8 HCV waiting list and 500+ on the Multi-Family waiting list who are in need of housing assistance. The need is based on the collection of data gathered from the most recent PIT count led by NMHC, in the homeless programs we’ve administered, including the Section 8 HCV and MultiFamily Programs for those in need of housing assistance.</p>
3	<b>Priority Need Name</b>	Affordable Housing
	<b>Priority Level</b>	High

<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Individuals Families with Children veterans Persons with HIV/AIDS Victims of Domestic Violence Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
<b>Geographic Areas Affected</b>	U.S. Territory U.S. Territory U.S. Territory
<b>Associated Goals</b>	Sustain Affordable Housing Stock Expand the housing stock Promote Fair Housing Provide services to the homeless population Disaster Recovery
<b>Description</b>	It is one of NMHC’s goals to provide loans through the HOME Program to low-income families and those individuals with special needs for the construction (or acquisition) of housing units which would give them the opportunity of homeownership. With this, NMHC will continue to refine its homeowner education and counseling for first-time homebuyers. NMHC also aims to rehabilitate housing units on an annual basis for low- income households, including those with special needs, to bring their homes up to safe, sanitary, and decent living standards, also rehabilitating the home to meet ADA standards. The goal is to rehabilitate up to 3 homes in the next year, and construct or enable eligible households to purchase up to 3 homes in the next year (with prior years’ residual funding). Through the ESG program, the CNMI will continue to assist at least 6 households a year with rapid re-housing and homeless prevention assistance a year.

<b>Basis for Relative Priority</b>	<p>There are 202+ households on the Section 8 HCV and Multi-Family waiting list and 60+ on the HOME Program waiting list. The PIT count conducted in 2020 found that 302 households, comprised of 1,207 persons were either literally homeless or at risk of becoming homeless. A majority of these households include members who are elderly, members who are victims of domestic violence, veterans, and those who are homeless and in need of housing assistance.</p>
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**Narrative (Optional)**

## SP-30 Influence of Market Conditions – 91.315(b)

### Influence of Market Conditions

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

Table 52 – Influence of Market Conditions

## **SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)**

### **Introduction**

In PY25, the following financial resources are available for projects to address new activities for PY25,

1. HUD CPD entitlement allocated funds total \$1,469,058 (\$980,125 for CDBG, \$407,723 for HOME, and \$81,210 for ESG).

### **Anticipated Resources** Table 53 - Anticipated Resources

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

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

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

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

### **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	\$980,125	\$24,380.95	\$0	\$1,004,505.95	\$0	For the PY25 Action Plan year, CDBG funds will be used for public facilities and program administration and planning

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	\$407,723	\$330,735.90	\$0	\$738,458.90	\$0	PY 2025 HOME funds will be for homeowner rehab and new construction and program administration and planning.

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	\$81,210	\$0	\$0	\$81,210	\$0	At least 60% of ESG funding will be allocated to rapid re- housing activities while 40% of ESG funding will be used for homelessness prevention activities (calculated after percentages have been set aside for program administration (7.5%) and HMIS. NMHC will focus on assisting the literally homeless households, since it's a rapidly growing problem in the CNMI.

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:		
HTF	Public - Federal	Acquisition, Admin and Planning, Homebuyer Assistance, Multifamily Rental New Construction, Multifamily Rental Rehab, New construction for Ownership	\$0	\$0	\$0	\$0	\$0	The CNMI will not implement the HTF Program in PY 2025.

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:		
Other	Public - Federal	Admin and Planning Economic Development, Homebuyer assistance, Homeowner Rehab Housing, New construction for Ownership Public Improvements	\$26,273,000	\$0	\$0	\$26,273,000	\$0	CDBG-DR allocation reflected is the estimated amount of CDBG-DR funding expected to be obligated and expended during FY 2025

**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 the CNMI.

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

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

**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. The island of Saipan has a land area of 11,913 hectares, of which 51% is public land. The island of Tinian has a land area of 10,177 hectares, of which 90% is public land, and which the US Military is leasing 68% of the public land. The island of Rota has a land area of 8,693 hectares, of which 72% is public land. The Northern Islands has a land area of 13,307 hectares, of which 100% is public land.

## SP-40 Institutional Delivery Structure – 91.315(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
CNMI Office of the Governor and Lt. Governor	Government	Planning	Other
24th CNMI Legislature	Government	Planning	Other
Northern Marianas Housing Corporation	Government	Economic Development, Homelessness Non-homeless Special needs Ownership, Public Housing Rental neighborhood improvements, Public facilities, Public services	Other
Offices of the Mayors of Saipan, Tinian, and Rota	Government	Non-homeless special needs, Neighborhood improvements, Public facilities, Public services	Other
Northern Marianas Protection and Advocacy Systems	Non-profit organizations	Non-homeless special needs	Other
Department of Community and Cultural Affairs	Government	Homelessness, Non-homeless special needs	Other
Karidat Social Services	Non-profit organizations	Homelessness	Other

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Commonwealth Economic Development Authority	Government	Economic Development	Other

**Table 54 - Institutional Delivery Structure**

**Assess of Strengths and Gaps in the Institutional Delivery System**

**STRENGTHS:** Although there is a shortage of state agencies that is necessary to address most of the priority needs of the ConPlan (e.g. other state agencies to provide housing assistance, transitional housing programs for special needs population and those who were formerly incarcerated, homeless programs etc.), those organizations that currently exist in the CNMI work diligently towards one common goal: to provide affordable housing, supportive services, and community development assistance to benefit low-moderate income families. All data that can be gathered to support the priority needs listed in the ConPlan is gathered internally from various state agencies. And with relation to the completion of an Analysis of Impediments report, the CNMI has sought for stateside vendors to assist in identifying the impediments to affordable housing. The central procurement process allows state agencies to seek vendors outside of the CNMI. **GAPS:** Unfortunately, the CNMI lacks pertinent information necessary to input statistics into the Consolidated Plan and into the Analysis of Impediments. Aside from NMHC, there is only one other agency that provides housing assistance to homeless households. NMHC must also rely on stateside vendors to complete the Analysis of Impediments. Therefore, the institutional delivery system is considered weak since there is not much interaction or coordination between agencies due to the lack of agencies on island that will be able to supply quantitative data that will support most priority needs outlined in the ConPlan. Although there are a handful of non-profit and public sector social service providers, there is a lack in organizational capacity and funding to operate a CoC in the CNMI. Therefore, the interaction and coordination between agencies are very limited in addressing priority needs. The lead agency will enhance the coordination and interaction every year with existing agencies by getting involved in training, inter-agency meetings, and committees, so that we can avail of opportunities that will improve the institutional delivery system.

**Availability of services targeted to homeless persons and persons with HIV and mainstream services**

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	
Legal Assistance	X	X	X

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X	X	

<b>Street Outreach Services</b>			
Law Enforcement	X		
Mobile Clinics	X		
Other Street Outreach Services	X		

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

<b>Other</b>			

**Table 55 - Homeless Prevention Services Summary**

**Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and**

**families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction**

Unlike its neighboring island of Guam, the CNMI lacks a number of agencies that specifically focus its services for homeless persons. Although there are a number of services (see categories above) provided in the CNMI, only a few are targeted to the homeless population. There are currently no homeless shelters in the CNMI, and as of date, a Continuum of Care program does not exist in the CNMI. This is due to the lack of organizational capacity in order to carry out the program successfully. For the first time, the Northern Marianas Housing Corporation offered financial assistance specifically to literally homeless and those who are at risk of homelessness in 2009 through the Homelessness Prevention and Rapid Re-Housing Program made possible through the ARRA Grants. Through the program, although a total of 1,500 households out of a total of 2,000 households who applied for the program were made eligible; however, due to limited funding, only 197 households were assisted for a period of six months. Financial assistance was given through rental payments and utility deposits only. In 2011, NMHC transitioned from allocating operational funding to the Guma Esperansa Shelter and the Division of Youth Shelter to allocating Emergency Solutions Grant Funds to Karidat Social Services for rapid rehousing and homeless prevention assistance. As of date, there are a total of 22 households assisted with ESG funds. Assistance includes rental payments, utility deposits, and utility payments for a period of 12 months. The Karidat Social Services, a Subgrantee of ESG funds, also offers financial assistance through their Emergency Food and Shelter Program, in which the eligible household is given a one-month hotel voucher and food voucher. The program targets homeless families with children and homeless individuals. The Guma Esperansa Shelter offers shelter, food, and counseling services for victims of domestic violence, sexual assault, and human trafficking including their children who have become literally homeless. In the past five years, Guma Esperansa has assisted a total of 762 homeless households due to victimization.

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

STRENGTHS: Although there is a shortage of state agencies that are necessary to address most of the priority needs of the ConPlan (e.g. other state agencies to provide housing assistance, transitional housing programs for special needs population and those who were formerly incarcerated, homeless programs etc.), those organizations that currently exist in the CNMI work diligently towards one common goal: to provide affordable housing, supportive services, and community development assistance to benefit low-moderate income families. All data that can be gathered to support the priority needs listed in the ConPlan is gathered internally from various state agencies. And with relation to the completion of an Analysis of Impediments report, the CNMI has sought for stateside vendors to assist in identifying the impediments to affordable housing. The central procurement process allows state agencies to seek vendors outside of the CNMI.

GAPS: Unfortunately, the CNMI lacks pertinent information necessary to input statistics into the Consolidated Plan and into the Analysis of Impediments. Aside from NMHC, there is only one other agency that provides housing assistance to homeless households. NMHC must also rely on stateside vendors to complete the Analysis of Impediments. Therefore, the institutional delivery system is considered weak since there is not much interaction or coordination between agencies due to the lack of agencies on island that will be able to supply quantitative data that will support most priority needs outlined in the ConPlan. Although there are a handful of non-profit and public sector social service providers, there is a lack in organizational capacity and funding to operate a CoC in the CNMI. Therefore, the interaction and coordination between agencies are very limited to address priority needs. The lead agency will enhance the coordination and interaction every year with existing agencies by getting involved in training, inter-agency meetings, and committees, so that we can avail of opportunities that will improve the institutional delivery system.

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

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

## SP-45 Goals Summary – 91.315(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Infrastructure Improvements	2025	2029	Non-Homeless Special Needs Non-Housing Community Development	Saipan Tinian Rota	Non-housing Community Development	CDBG: \$980,125.00	Other: 10 Other
2	Job Creation/Retention	2025	2029	Non-Homeless Special Needs Non-Housing Community Development	Saipan Tinian Rota	Non-housing Community Development	CDBG: \$980,125.00	Other: 3 Other
3	Public Services	2025	2029	Non-Homeless Special Needs Non-Housing Community Development	Saipan Tinian Rota	Non-housing Community Development	CDBG: \$980,125.00	Other: 5 Other
4	Sustain Affordable Housing Stock	2025	2029	Affordable Housing Non-Homeless Special Needs	Saipan Tinian Rota	Affordable Housing	HOME: \$407,723.00	Homeowner Housing Rehabilitated: 15 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Expand the housing stock	2025	2029	Affordable Housing Non-Homeless Special Needs	Saipan Tinian Rota	Affordable Housing	HOME: \$407,723.00	Homeowner Housing Added: 8 Household Housing Unit
6	Emergency Shelter/Transitional Housing	2025	2029	Affordable Housing Homeless	Saipan Tinian Rota	Homelessness	CDBG: \$980,125.00	Other: 2 Other
7	Public Facilities and Improvements	2025	2029	Non-Homeless Special Needs Non-Housing Community Development	Saipan Tinian Rota	Non-housing Community Development	CDBG: \$980,125.00	Other: 10 Other
8	Promote Fair Housing	2025	2029	Affordable Housing Public Housing Homeless Non-Homeless Special Needs	Saipan Tinian Rota	Homelessness Affordable Housing	CDBG: \$980,125.00 HOME: \$407,723.00	Other: 5 Other
9	Community Enhancement	2025	2029	Homeless Non-Housing Community Development	Saipan Tinian Rota	Non-housing Community Development	CDBG: \$980,125.00	Other: 15 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	Provide services to the homeless population	2025	2029	Affordable Housing Homeless	Saipan Tinian Rota	Homelessness Affordable Housing	ESG: \$81,210.00	Tenant-based rental assistance / Rapid Rehousing: 20 Households Assisted  Homelessness Prevention: 40 Persons Assisted

11	Disaster Recovery	2020	2024	Affordable Housing, Homeless Non-Homeless Special Needs Non-Housing Community Development Disaster Recovery	Saipan Tinian Rota	Non-housing Community Development Homelessness Affordable Housing	CDBG-DR: \$243,946,000	Rental units constructed: 235 Household Housing Unit  Rental units rehabilitated: 75 Household Housing Unit  Homeowner Housing Added: 153 Household Housing Unit  Homeowner Housing Rehabilitated: 129 Household Housing Unit  Direct Financial Assistance to Homebuyers: 129 Households Assisted  Other: 32 Other
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Table 56 – Goals Summary

## Goal Descriptions

<b>1</b>	<b>Goal Name</b>	Infrastructure Improvements
	<b>Goal Description</b>	<ul style="list-style-type: none"> <li>● Construct infrastructure to support housing</li> <li>● Improve infrastructure to support housing</li> <li>● To improve infrastructure to strengthen resilience to mitigate potential disaster damage</li> </ul> <p>The CNMI plans to fund up to 2 projects a year, 10 projects within 5 years (figure inputted into the "other" category)</p>
<b>2</b>	<b>Goal Name</b>	Job Creation/Retention
	<b>Goal Description</b>	<ul style="list-style-type: none"> <li>● Promote employment opportunities for persons with disabilities</li> <li>● Support micro-businesses with loans or grants</li> </ul> <p>The CNMI plans to allocate funding to up to 3 projects within 5 years. The figure is inputted in the "other" section below.</p>
<b>3</b>	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	<p>To support projects particularly related to healthcare, recreational programs, service for senior citizens, substance abuse programs, and fire and emergency medical services</p> <p>The CNMI plans to allocate funds to (1) public service project a year which equates to (5) projects in 5 years.</p>
<b>4</b>	<b>Goal Name</b>	Sustain Affordable Housing Stock

	<b>Goal Description</b>	<ul style="list-style-type: none"> <li>● Support any HUD financing program that expands the stock of affordable housing in the CNMI.</li> <li>● Assist very low and low-moderate income first time home-owners to rehabilitate a home</li> </ul> <p>To rehabilitate (3) homes a year with HOME funds, to provide for a more safe, resilient, sanitary and decent house. The number below represents the number of homes to be rehabilitated within (5) years.</p>
<b>5</b>	<b>Goal Name</b>	Expand the housing stock
	<b>Goal Description</b>	<ul style="list-style-type: none"> <li>● Support any HUD financing that expands the stock of affordable housing in the CNMI</li> <li>● Assist very low and low-moderate income families construct or acquire a safe, affordable home</li> </ul> <p>The CNMI plans to allocate funds starting PY 2025 for new construction or acquisition of a home, since PY 2025 will be allocated entirely to homeowner rehab. Starting PY 2025, the CNMI plans to fund up to 2 projects a year with HOME funds equating to (8) homes from PY 2025- 2029</p>
<b>6</b>	<b>Goal Name</b>	Emergency Shelter/Transitional Housing
	<b>Goal Description</b>	<ul style="list-style-type: none"> <li>● Support financing of transitional housing to provide temporary housing for homeless individuals, including those who are transitioning from drug rehabilitation centers and prison</li> <li>● Support financing the construction of an emergency shelter to provide temporary housing for those who are seeking shelter from a disaster or who find themselves temporary homeless</li> </ul> <p>The CNMI plans to fund (2) projects within 5 years to address the goal. The figure below in the "other" section pertains to the number of projects: 1) transitional housing and 2) emergency shelter</p>
<b>7</b>	<b>Goal Name</b>	Public Facilities and Improvements

	<b>Goal Description</b>	<p>To acquire, construct, or rehabilitate facilities for low-moderate income communities and special needs populations</p> <ul style="list-style-type: none"> <li>● Sports and Recreational Facilities</li> <li>● Community Centers</li> <li>● Facilities that improve services to the general public</li> <li>● Youth Centers</li> <li>● Community Centers</li> </ul> <p>The CNMI plans to allocate funds up to (2) projects a year which equates to up to (10) projects within five years, as shown in the "other" section below.</p>
<b>8</b>	<b>Goal Name</b>	Promote Fair Housing
	<b>Goal Description</b>	<p>Identify and address barriers to affordable housing</p> <ul style="list-style-type: none"> <li>● To hold (1) Fair Housing workshop a year which equates to (5) fair housing workshops within (5) years. Funds will be shared from the CDBG and HOME programs.</li> </ul>
<b>9</b>	<b>Goal Name</b>	Community Enhancement
	<b>Goal Description</b>	<ul style="list-style-type: none"> <li>● Provide operations support for programs serving homeless persons, disabled persons, and those with special needs</li> <li>● Support programs addressing poverty for income-eligible individuals, specifically those who are homeless or at-risk of homelessness</li> </ul> <p>The goal is to fund up to (3) projects a year (up to 15 projects within 5 years), which is reflected in the "other" section below.</p>
<b>10</b>	<b>Goal Name</b>	Provide services to the homeless population

	<b>Goal Description</b>	<ul style="list-style-type: none"> <li>• Provide Operations Support for programs serving homeless persons, disabled persons, and those with special needs.</li> <li>• Support programs addressing poverty for income-eligible individuals, specifically those who are homeless or at-risk of homelessness</li> </ul> <p>(2 households x average of 4 family members = 8 total persons x 5 years= 40 <b>persons</b> with homelessness prevention funds ) (4 households a year x 5 years = 20 households with rapid re-housing assistance)</p>
<b>1</b>	<b>Goal Name</b>	Disaster Recovery
<b>1</b>	<b>Goal Description</b>	<p>To allocate CDBG-DR funding to Housing, Infrastructure and Economic Development to ensure added resiliency in future, potential disasters</p> <p>The figures in the table below represents the projected # of projects within the next five years:</p> <p>Other: estimated (22) infrastructure projects and (2) economic development projects (equates to <b>(24)</b> total projects) at least 90% completed within 5 years in addition to <b>(8)</b> "single family new construction development)</p>

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

ESG funds will be used to provide rapid rehousing assistance to an estimated 6 households. ESG funds will be used to assist an estimated 6 households to avoid eviction and homeless prevention assistance to households with extremely low incomes (at or below 30% of Area Median Income). HOME funds in PY20 are expected to assist up to 3 eligible households to rehabilitate their homes. HOME eligibility will be based on the households meeting the income threshold of 80% AMI. The CNMI also seeks to contribute CDBG-DR funds to resolve the overall shortage of housing for households at or below the HUD limit of 80% AMI.

## **SP-50 Public Housing Accessibility and Involvement – 91.315(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

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

### **Activities to Increase Resident Involvements**

Currently, there is no Resident Advisory Board (RAB) under NMHC's Section 8 Housing Assistance Payment Program.

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

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

No

### **Plan to remove the 'troubled' designation**

N/A NMHC is not a "troubled" agency

## **SP-55 Barriers to affordable housing – 91.315(h)**

### **Barriers to Affordable Housing**

#### **Minimum Wage & Employment**

The CNMI's current minimum wage remains at \$7.25 per hour. At this wage level, most families do not earn enough to build or acquire affordable housing. High living costs—including utilities, food, fuel, and other basic commodities—further erode household income, leaving little to no room for savings or homeownership. As a result, many low-income families are forced to live in substandard housing lacking proper sanitation facilities, adequate space, or structural safety.

Developers have attributed the rising cost of housing to several factors, including increasing expenses for labor, building materials, land, and utilities. These combined economic pressures limit the supply of affordable housing and place a heavy burden on working families.

#### **Construction Costs**

One of the most significant barriers to affordable housing development in the CNMI is the high and rising cost of construction. The CNMI's geographic location in the Pacific typhoon belt necessitates stringent building codes designed to withstand winds exceeding 200 MPH, as experienced during Super Typhoon Yutu. These structural requirements drive up the cost of materials and labor.

According to the NMHC's Asset Management Division, the average cost to construct a home using concrete masonry units (CMU) with a reinforced concrete foundation is approximately \$191,952—a figure that has nearly doubled since 2015. A major contributor to this increase is the growing scarcity of affordable labor.

The enactment of U.S. Public Law 110-229, which phases out the CNMI's non-resident labor pool (Commonwealth Workers or CWs), has placed significant strain on the construction industry. This reduction in foreign labor, combined with substantial outmigration during previous economic downturns, has left the CNMI with a limited local workforce. According to the 2010 CNMI Census, the population declined by nearly 22% compared to the previous decade. The resulting labor shortage directly affects the pace and cost of construction.

The Government Accountability Office (GAO) has warned that the elimination of the CNMI's non-resident labor pool could result in a reduction of up to 62% in Gross Domestic Product (GDP). Given the CNMI's continued reliance on CW workers and the uncertainty surrounding future extensions of the program, it is critical to plan strategically for the territory's long-term economic and workforce development needs.

#### **Challenges Faced by Persons with Disabilities**

Persons with disabilities face unique and significant barriers to accessing affordable and accessible housing. In partnership with the Northern Marianas Protection and Advocacy System, Inc. (NMPASI) and the Council on Developmental Disabilities (CDD), NMHC has identified several persistent challenges:

- **Program Accessibility:** Individuals with disabilities have reported difficulties accessing housing services. Case managers recommend adjusting income eligibility criteria to reflect the high cost of living in the CNMI and extending program timeframes.
- **Cost of Living:** The high cost of utilities in the CNMI requires increased utility allowances to ensure housing remains affordable.
- **Service Delivery:** There is a strong demand for in-home services and case management to be delivered directly to individuals with disabilities.
- **Application Barriers:** Application forms and documents are not accessible to individuals who are visually impaired, creating obstacles during the application process.
- **Housing Supply:** There is a critical need for transitional housing and the expansion of rental units for individuals with disabilities, particularly those who are homeless or at risk of homelessness.
- **Program Waitlists:** Long waiting lists for Section 8 and other subsidized housing programs limit timely access to housing for those in need.
- **Fair Housing Enforcement:** There is a need for improved enforcement and education regarding the Fair Housing Act of 1998 to ensure that individuals with disabilities are protected from discrimination.

In addition to the barriers outlined above, the NMHC completed its most recent **Analysis of Impediments to Fair Housing** on **July 27, 2020**. For further details, see **Appendix G**.

## **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

### **Construction Costs:**

The CNMI, through its U.S. Delegate to Washington, D.C., alongside the local construction industry and business community, continues to advocate for the restoration of H-2B visa waivers for construction workers. There is also a strong push to increase the cap on the number of contract workers—particularly those from the Philippines and China—to help address the labor shortage in the construction sector and reduce overall building costs.

**Minimum Wage:**

The CNMI will continue to collaborate with the federal government, through its U.S. Delegate, to advocate for increases in the minimum wage. Raising wages is essential for CNMI residents to afford the rising costs of utilities, fuel, and other basic commodities—challenges that significantly limit the ability of most families to purchase or construct affordable housing.

**People with Disabilities:**

The CNMI will address housing access impediments for individuals with disabilities through ongoing partnerships with key organizations, including the Northern Marianas Protection & Advocacy Systems, Inc. (NMPASI), the Council on Developmental Disabilities, the CNMI Office of Vocational Rehabilitation, and the Commonwealth Office of Transit Authority. Efforts will also include strengthening fair housing education by providing additional training to the NMHC Fair Housing Officer and increasing the number of fair housing workshops tailored to persons with special needs.

## **SP-60 Homelessness Strategy – 91.315(d)**

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

The NMHC will continue to conduct the Point In Time Surveys to collect an estimated count of homeless individuals/households in the CNMI. The CNMI will continue the ESG program to assist the literally homeless and at-risk of homelessness families (6 families per year). Through the ESG-CV rental assistance program, the NMHC is assisting close to 200 families with rapid re-housing and homeless prevention assistance. NMHC has also referred its families, on the waiting list, to the CNMI Office of Grants Management as they recently launched the Commonwealth Covid Emergency Rental Assistance Program, with an allocation of \$10M. NMHC also supports the work of Karidat Social Services who continue to provide monthly hotel/motel vouchers to eligible families made possible through a grant from the Department of Health and Human Services. Each individual needs are assessed by the case workers in the various organizations such as Karidat Social Services, OGM, and NMHC.

### **Addressing the emergency and transitional housing needs of homeless persons**

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

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

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

- 1) Continue to allocate ESG funding to support the non-profit organization(s) who will be conducting case management for literally homeless and at risk of homelessness households- To assist at least (6) households each year (rapid re-housing and homelessness prevention assistance).
- 2) Support the work of non-profit organizations and the public sector providing assistance to very low and low-income individuals, and special needs populations.
- 3) As the statistics have been gathered for the number of people living with AIDS in the CNMI, and although the number is rather small, the NMHC will identify funding to support these special needs populations.
- 4) Continue to support the revitalization of programs implemented by the Transitional Living Center who offer services to those who are likely to become homeless after being discharged from a publicly funded institution (prison, mental institution, etc.) and the Independent Living Center who offer life skill training to a special needs population.
- 5) Continue to support the two existing shelters (whether through CDBG or ESG) in the CNMI- the Guma Esperansa Shelter (serve domestic violence victims who are considered homeless), and the Division of Youth Services Shelter (serve youth who are victims of child abuse and neglect/runaway youth).
- 6) Within the next five years, conduct a point-in-time survey to gather more accurate information on homeless households in the CNMI1 , and once the data is gathered, again, apply for a Continuum of Care Program grant in order to meet the homeless needs in the CNMI (Target date: Year 1 of the Consolidated Plan).
- 7) Acquire, construct, rehabilitate or convert structures for use as housing for special needs and homeless populations.
- 8) Acquire, construct, rehabilitate or convert structures used as public facility to provide services for special needs and homeless populations (i.e. soup kitchens, outreach facilities, etc.)

## **SP-65 Lead based paint Hazards – 91.315(i)**

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

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

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

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

## **SP-70 Anti-Poverty Strategy – 91.315(j)**

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

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

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

Moreover, as a result of Super Typhoon Yutu, and the allocation of nearly half a billion dollars allocated to the CNMI for Disaster Recovery, it would be an opportunity for the CNMI to employ individuals who live below the poverty level. NMHC has also established relationships with a multitude of agencies and is

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

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

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

## **SP-80 Monitoring – 91.330**

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

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

NMHC will continue to monitor compliance with all program requirements by conducting random on-site visits and address setbacks (if any) by communicating with the Subrecipient until all issues have been resolved. As with the ESG Program, the Deputy Corporate Director will review the files (usually once every two years) to ensure that policies are adhered to, processes are in place, and that internal controls are practiced.

## Expected Resources

### AP-15 Expected Resources – 91.320(c)(1,2)

#### Introduction

In PY25, the following financial resources are available for projects to address new activities for PY25.

1. HUD CPD entitlement allocated funds total \$1,4069,058 (\$980,125 for CDBG, \$407,723 for HOME, and \$81,210 for ESG).

**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	\$980,125.00	\$24,380.95	\$0	\$1,004,505.95	\$0	For the PY25 CDBG funds will be used for public facilities and program administration and planning.

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	\$407,723	\$330,735.90	\$0	\$738,458.90	\$0	PY 2025 HOME funds will be for homeowner rehab and new construction and program administration and planning.

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	\$81,210.00	\$0	\$0	\$81,210.00	\$0	At least 60% of ESG funding will be allocated to rapid re-housing activities while 40% of ESG funding will be used for homelessness prevention activities (calculated after percentages have been set aside for program administration (7.5%) and HMIS. NMHC will focus on assisting the literally homeless households, since it's a rapidly growing problem in the CNMI.

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:		
HTF	Public - Federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	0	0	0	0	0	The CNMI will not implementing the HTF Program in PY 2025.

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:		
Other	Public - Federal	Admin and Planning Economic Development Homebuyer assistance Homeowner rehab Housing New construction for ownership Public Improvements	\$26,273,000	\$0	\$0	\$26,273,000	\$0	CDBG-DR allocation reflected is the estimated amount of CDBG-DR funding expected to be obligated and expended during FY 2021.

**Table 57 - Expected Resources – Priority Table**

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

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

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

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

**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. The island of Saipan has a land area of 11,913 hectares, of which 51% is public land. The island of Tinian has a land area of 10,177 hectares, of which 90% is public land, and which the US Military is leasing 68% of the public land. The island of Rota has a land area of 8,693 hectares, of which 72% is public land. The Northern Islands has a land area of 13,307 hectares, of which 100% is public land.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Infrastructure Improvements	2025	2029	Non-Homeless Special Needs Non-Housing Community Development	Saipan Tinian Rota	Non-housing Community Development	CDBG: \$980,125	Other: 2 Other
2	Job Creation/Retention	2025	2029	Non-Homeless Special Needs Non-Housing Community Development	Saipan Tinian Rota	Non-housing Community Development	CDBG: \$980,125	Other: 0 Other
3	Public Services	2025	2029	Non-Homeless Special Needs Non-Housing Community Development	Saipan Tinian Rota	Homelessness	CDBG: \$980,125	Other: 1 Other
4	Sustain Affordable Housing Stock	2025	2029	Affordable Housing Non-Homeless Special Needs	Saipan Tinian Rota	Affordable Housing	HOME: \$407,723	Homeowner Housing Rehabilitated: 3 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Expand the housing stock	2025	2029	Affordable Housing Non-Homeless Special Needs	Saipan Tinian Rota	Affordable Housing	HOME: \$407,723	Homeowner Housing Added: 0 Household Housing Unit
6	Emergency Shelter/Transitional Housing	2025	2029	Affordable Housing Homeless	Saipan	Homelessness	CDBG: \$980,125	Other: 0 Other
7	Public Facilities and Improvements	2025	2029	Non-Homeless Special Needs Non-Housing Community Development	Saipan Rota	Non-housing Community Development	CDBG: \$980,125	Other: 2 Other
8	Promote Fair Housing	2025	2029	Affordable Housing Public Housing Homeless Non-Homeless Special Needs	Saipan Tinian Rota	Non-housing Community Development Homelessness Affordable Housing	CDBG: \$980,125 HOME: \$407,723	Other: 1 Other
9	Community Enhancement	2025	2029	Homeless Non-Housing Community Development	Saipan Tinian Rota	Non-housing Community Development Homelessness Affordable Housing	CDBG: \$980,125	Other: 3 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	Provide services to the homeless population	2025	2029	Affordable Housing Homeless	Saipan Tinian Rota	Homelessness	ESG: \$81,210	Tenant-based rental assistance / Rapid Rehousing: 4 Households Assisted Homelessness Prevention: 8 Persons Assisted
11	Disaster Recovery	2025	2029	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Disaster Recovery	Saipan Tinian Rota	Non-housing Community Development Homelessness Affordable Housing	CDBG-DR: \$243,946,000	Rental units constructed: 38 Household Housing Unit Rental units rehabilitated: 29 Household Housing Unit Homeowner Housing Added: 12 Household Housing Unit Homeowner Housing Rehabilitated: 17 Household Housing Unit Direct Financial Assistance to Homebuyers: 7 Households Assisted Other: 12 Other

Table 58 – Goals Summary

## Goal Descriptions

1	<b>Goal Name</b>	Infrastructure Improvements
	<b>Goal Description</b>	<p>Construct infrastructure to support housing</p> <p>Improve infrastructure to support housing to improve infrastructure to strengthen resilience to mitigate potential disaster damage</p> <p>The CNMI plans to fund up to 2 projects a year, 10 projects within 5 years (figure inputted into the "other" category)</p>
2	<b>Goal Name</b>	Job Creation/Retention
	<b>Goal Description</b>	<ul style="list-style-type: none"> <li>● Promote employment opportunities for persons with disabilities</li> <li>● Support micro-businesses with loans or grants</li> </ul> <p>The CNMI plans to allocate funding to up to 3 projects within 5 years, starting in PY 2025. The figure is inputted in the "other" section below.</p>
3	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	<p>To support projects particularly related to healthcare, recreational programs, service for senior citizens, substance abuse programs, and fire and emergency medical services</p> <p>The CNMI plans to allocate funds to (1) public service project a year which equates to (5) projects in 5 years.</p>
4	<b>Goal Name</b>	Sustain Affordable Housing Stock
	<b>Goal Description</b>	<ul style="list-style-type: none"> <li>● Support any HUD financing program that expands the stock of affordable housing in the CNMI.</li> <li>● Assist very low and low-moderate income first time home-owners to rehabilitate a home</li> </ul> <p>To rehabilitate (3) homes a year with HOME funds, to provide for a more safe, resilient, sanitary and decent house. The number below represents the number of homes to be rehabilitated within (5) years.</p>
5	<b>Goal Name</b>	Expand the housing stock

	<b>Goal Description</b>	<ul style="list-style-type: none"> <li>● Support any HUD financing that expands the stock of affordable housing in the CNMI</li> <li>● Assist very low and low-moderate income families construct or acquire a safe, affordable home</li> </ul> <p>The CNMI plans to allocate funds starting PY 2025 for new construction or acquisition of a home, since PY 2020 will be allocated entirely to homeowner rehab. Starting PY 2025, the CNMI plans to fund up to 2 projects a year with HOME funds equating to (8) homes from PY 2025- 2029</p>
<b>6</b>	<b>Goal Name</b>	Emergency Shelter/Transitional Housing
	<b>Goal Description</b>	<ul style="list-style-type: none"> <li>● Support financing of transitional housing to provide temporary housing for homeless individuals, including those who are transitioning from drug rehabilitation centers and prison</li> <li>● Support financing the construction of an emergency shelter to provide temporary housing for those who are seeking shelter from a disaster or who find themselves temporary homeless</li> </ul> <p>The CNMI plans to fund (2) projects within 5 years to address the goal. The figure below in the "other" section pertains to the number of projects: 1) transitional housing and 2) emergency shelter, starting PY 2025</p>
<b>7</b>	<b>Goal Name</b>	Public Facilities and Improvements
	<b>Goal Description</b>	<p>To acquire, construct, or rehabilitate facilities for low-moderate income communities and special needs populations</p> <ul style="list-style-type: none"> <li>● Sports and Recreational Facilities</li> <li>● Community Centers</li> <li>● Facilities that improve services to the general public</li> <li>● Youth Centers</li> <li>● Community Centers</li> </ul> <p>The CNMI plan to allocate funds up to (2) projects a year which equates to up to (10) projects within five years, as shown in the "other" section below.</p>
<b>8</b>	<b>Goal Name</b>	Promote Fair Housing

	<b>Goal Description</b>	Identify and address barriers to affordable housing <ul style="list-style-type: none"> <li>To hold (1) Fair Housing workshop a year which equates to (5) fair housing workshops within (5) years. Funds will be shared from the CDBG and HOME programs.</li> </ul>
9	<b>Goal Name</b>	Community Enhancement
	<b>Goal Description</b>	<ul style="list-style-type: none"> <li>Provide operations support for programs serving homeless persons, disabled persons, and those with special needs</li> <li>Support programs addressing poverty for income-eligible individuals, specifically those who are homeless or at-risk of homelessness</li> </ul> <p>The goal is to fund up to (3) projects a year (up to 15 projects within 5 years), which is reflected in the "other" section below.</p>
10	<b>Goal Name</b>	Provide services to the homeless population
	<b>Goal Description</b>	<ul style="list-style-type: none"> <li>Provide Operations Support for programs serving homeless persons, disabled persons, and those with special needs.</li> <li>Support programs addressing poverty for income-eligible individuals, specifically those who are homeless or at-risk of homelessness</li> </ul> <p>(2 households average of 4 persons = 8 persons/yr with homelessness prevention funds; 4 households/yr with rapid rehousing assistance)</p>
11	<b>Goal Name</b>	Disaster Recovery
	<b>Goal Description</b>	<p>To allocate CDBG-DR funding to Housing, Infrastructure and Economic Development to ensure added resiliency in future, potential disasters</p> <p>The figure below indicates the projected numbers for the next PY. In the "other" section, the figure represents the # of infrastructure projects, the # of economic development projects, and the # of single family new construction development to be initiated within the next Program Year, according to projections.</p>

**AP-25 Allocation Priorities – 91.320(d)**

**Introduction:**

**Funding Allocation Priorities**

Program	Goals		
CDBG			
HOME			
HOPWA			
ESG			

**Table 59 – Funding Allocation Priorities**

**Reason for Allocation Priorities**

**How will the proposed distribution of funds address the priority needs and specific objectives described in the Consolidated Plan?**

A significant portion of funding is allocated to affordable housing development and rehabilitation, directly responding to the ConPlan’s top priority of increasing access to safe, decent, and affordable housing.

- CDBG: Funds will support neighborhood revitalization, public facility improvements, and job creation, meeting objectives related to community development and economic opportunity.
- HOME: These funds will go toward rehab housing activities and homebuyer assistance, addressing the goal of expanding affordable housing options.
- ESG: Allocated to emergency shelters and rapid rehousing, meeting objectives to reduce homelessness and improve housing stability.

## **AP-30 Methods of Distribution – 91.320(d)&(k)**

### Introduction:

The CNMI’s methods of distributing HUD formula grant funds under the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG), and Housing Trust Fund (HTF) are designed to ensure that resources are allocated strategically to address the priority needs and objectives outlined in the Consolidated Plan.

### Distribution Methods:

The distribution of funds under the PY2025 Annual Action Plan directly supports the priority needs and specific objective outlined in the CNMI’s Consolidated Plan. Funds are allocated among eligible activities and geographic areas to maximize impact, promote equity, and ensure alignment with HUD program goals. Distribution methods are developed to promote fairness, transparency, and efficiency while targeting assistance to the most vulnerable populations and areas with the greatest demonstrated need. Each program utilizes a distinct allocation process- such as competitive applications, formula-based distributions, or direct allocations- to maximize impact and compliance with federal regulations. These methods support the CNMI’s goals to expand affordable housing, reduce homelessness, improve public infrastructure, and enhance the quality of life for low- and moderate- income residents.

**Table 60 - Distribution Methods by State Program**

State Program Name:	Funding Sources:	Describe the state program addressed by the Method of Distribution.	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	Describe how resources will be allocated among funding categories.	Describe threshold factors and grant size limits.	What are the outcome measures expected as a result of the method of distribution?
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**Discussion:**

The Methods of Distribution (AP-30), detailed in 24 CFR § 91.320(d) and (k), are essential for the fair and effective allocation of HUD funding within the CNMI. By implementing clear distribution procedures, strong monitoring systems, and compliance with federal and local requirements, the CNMI seeks to improve community development and meet the housing needs of its population.

## AP-35 Projects – (Optional)

### Introduction:

In the table below, you will find the selected projects for Program Year 2025, based on an evaluation conducted by the Planner, Planning and Administrative Assistant, and Office Manager/Procurement Officer in March 2025. Based on a set criteria (CDBG Program), the projects were scored, in order of priority (20% is automatically set-aside for planning and administrative costs): In addition to the CDBG Program, information on the HOME Program and ESG Program activities are listed below.

### Projects

#	Project Name
1	PY2025 CDBG Planning and Administrative Costs
2	Rehabilitation of the Emergency Shelter
3	Expansion and Rehabilitation of the Tanapag Youth Center
4	Expansion and rehabilitation of the Sinapalo Youth Center
5	Rehabilitation of Miguel (Tan Ge') Pangelinan Field
6	PY2025 HOME Planning and Administrative Costs
7	Homeowner Investment Partnership (Homeowner Rehabilitation)
8	Homeowner Investment Partnership (New Construction)
9	HESG 2025 Commonwealth of the Northern Mariana Islands

Table 61 – Project Information

### Describe the reasons for allocation priorities and any obstacles in 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 other 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. In addition, CDBG-DR's allocation priorities are for Housing, Infrastructure and Economic Development.

## **AP-38 Project Summary**

### **Project Summary Information**

The projects funded under this Annual Action Plan reflect a targeted investment strategy that aligns with the CNMI's Consolidated Plan goals and addresses the most pressing needs of low- and moderate-income individuals and communities. During the program year, funds from the CDBG, HOME, ESG, and HTF programs will be directed toward initiatives that support affordable housing development and preservation, homelessness prevention, economic opportunity, and infrastructure improvements. Each project is selected based on its ability to produce measurable outcomes, leverage additional resources, and promote equitable access to services and housing.

1	<b>Project Name</b>	PY 2025 CDBG Planning and Administrative Costs
	<b>Target Area</b>	Saipan Tinian Rota
	<b>Goals Supported</b>	Public Facilities and Improvements Promote Fair Housing Community Enhancement
	<b>Needs Addressed</b>	Non Housing Community Development
	<b>Funding</b>	CDBG: \$196,025.00
	<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 47,329 of which about 70 % are low-mod income. Estimated CDBG funding: \$196,025;Eligible activity under 24 CFR570.206(a)(1); National Objective: LMA 24 CFR Part 570.208(a)(1)(i);
	<b>Target Date</b>	9/30/2026
	<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 47,329; CDBG admin funds will maintained at the NMHC Central Office in Garapan, Saipan
	<b>Location Description</b>	CNMI-wide- Saipan, Tinian, and Rota with a population of 47,329; CDBG admin funds will be maintained at the NMHC Central Office in Garapan, Saipan.
<b>Planned Activities</b>	CDBG Planning and Administrative Costs	
2	<b>Project Name</b>	Rehabilitation of the Emergency Shelter
	<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: \$246,095.24

	<b>Description</b>	The Department of Community and Cultural Affairs (DCCA)/ Division of Youth Services (DYS) submitted a proposal for the rehabilitation of the Emergency Shelter located in Capital Hill, Saipan. The project will allow the Division of Youth Services(DYS) provide temporary placement of a child who is places under DYS custody as a result of child abuse and/or neglect and displaced/homeless youth. The programs and services include: providing direct client care and supervision, daily hygiene, preparing and serving meals, homework/tutoring services, school projects, and transportation services to and from appointments. Eligibility citation: Part 570.201(c). The project meets Goal #7: To acquire, construct or rehabilitate public facilities for low-mod income communities and special needs populations. CDBG Funding: \$240,000.00+ estimated PI of \$6,095.24= \$246,095.24; National Objective: LMA 24 CFR Part 570.208(a)(1)(i)
	<b>Target Date</b>	June 2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project will benefit the entire CNMI, as the Division of Youth Services is the mandated state agency to provide social service programs for children, youth and families throughout the CNMI. The project location will be on Saipan, its immediate service area, with a population of 41,927 of which 29,200 or 69% 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>	Capital Hill, Saipan
	<b>Planned Activities</b>	To rehabilitate the existing structures to improve the program services of the DYS Emergency Shelter and most importantly provide a temporary shelter for victims of child abuse and neglect and displaced/homeless youth
<b>3</b>	<b>Project Name</b>	Expansion and 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: \$150,095.24

	<b>Description</b>	The Department of Community and Cultural Affairs (DCCA)/ Division of Youth Services (DYS) submitted a proposal for the Expansion and Rehabilitation of the Tanapag Youth Center located in Tanapag, Saipan. The project will allow the Division of Youth Services (DYS) to provide prevention and supportive activities that would assist youths and families in developing sustainable basic/life skills. The program objective is to eliminate at-risk behaviors and provide opportunities for a more positive lifestyle, enhancing participant capacity and making healthier life choices and achieving self-sufficiency. Eligibility citation: Part 570.201(c). The project meets Goal #7: To acquire, construct or rehabilitate public facilities for low-mod income communities and special needs populations. CDBG Funding: \$144,000.00+ estimated PI of \$6,095.24= \$150,095.24; National Objective: LMA 24 CFR Part 570.208(a)(1)(i)
	<b>Target Date</b>	June 2026
	<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 the village of Sinapalo. Census Tract: 9501, Block group 1-3, with a total population of 1,876, of which 1,303 or 69% are low-mod income.
	<b>Location Description</b>	Sinapalo, Rota
	<b>Planned Activities</b>	To rehabilitate the existing structures to improve the program services of the Youth Center
<b>4</b>	<b>Project Name</b>	Expansion and Rehabilitation of the Sinapalo Youth Center
	<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: \$231,195.24

	<b>Description</b>	The Department of Community and Cultural Affairs (DCCA)/ Division of Youth Services (DYS) submitted a proposal for the Expansion and Rehabilitation of the Tanapag Youth Center located in Tanapag, Saipan. The project will allow the Division of Youth Services (DYS) to provide prevention and supportive activities that would assist youths and families in developing sustainable basic/life skills. The program objective is to eliminate at-risk behaviors and provide opportunities for a more positive lifestyle, enhancing participant capacity and making healthier life choices and achieving self-sufficiency. Eligibility citation: Part 570.201(c). The project meets Goal #7: To acquire, construct or rehabilitate public facilities for low-mod income communities and special needs populations. CDBG Funding: \$225,100.00+ estimated PI of \$6,095.24= \$231,195.24; National Objective: LMA 24 CFR Part 570.208(a)(1)(i)
	<b>Target Date</b>	June 2026
	<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 group 1-2, with a total population of 1,358, of which 938 or 69% are low-mod income.
	<b>Location Description</b>	Tanapag, Saipan
	<b>Planned Activities</b>	To rehabilitate the existing structures to improve the program services of the Youth Center
5	<b>Project Name</b>	Rehabilitation of the Miguel (Tan Ge’) Pangelinan Field
	<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: \$181,095.23

	<b>Description</b>	The Department of Community and Cultural Affairs (DCCA) and Northern Marianas Sports Association (NMSA) submitted a proposal for the Rehabilitation of the Miguel (Tan Ge') Pangelinan Field located in the Oleai Sports Complex, Saipan. The field is in need of repair since the damage caused by Super Typhoon Yutu. Minimal cosmetic repairs were made, but did not address the safety concerns needed to make the facility a safe and usable facility. The project will provide continued use for baseball and softball activities, community engagement and development. Once the project is completed, NMSA will be the responsible entity for the operation, maintenance and management of the Oleai Sports Complex. Eligibility citation: Part 570.201(c). The project meets Goal #7: To acquire, construct or rehabilitate public facilities for low-mod income communities and special needs populations. CDBG Funding: \$175,000.00+ estimated PI of \$6,095.23= \$181,095.23; National Objective: LMA 24 CFR Part 570.208(a)(1)(i)
	<b>Target Date</b>	June 2026
	<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 Oleai, Saipan. Census Tract: 2, Block group 1-2, with a total population of 1,358, of which 938 or 69% are low-mod income.
	<b>Location Description</b>	Oleai Sports Complex, Saipan
	<b>Planned Activities</b>	Replacement of spectator seating, tin roof, extension of dugouts, fencing and gate (for spectator stand, outfield, west side of field), and installation of lighting fixtures.
<b>6</b>	<b>Project Name</b>	PY 2025 HOME Planning and Administrative Costs
	<b>Target Area</b>	Saipan Tinian Rota
	<b>Goals Supported</b>	Sustain Affordable Housing Stock Expand Housing Stock Promote Fair Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$61,158.55

	<b>Description</b>	HOME Planning and administrative costs for PY 2025; In the annual goals supported, all goals related to the HOME program were checked, as administrative costs will be incurred in planning for projects related to the HOME goals. HOME admin funded amount:(15% of PY 202 Allocation) \$61,158.55 + \$38,335.34= \$99,493.89 (15% of expected HOME PI)= \$99,493.79; Eligible activity under 24 CFR 92.207(a)(1)
	<b>Target Date</b>	9/30/2026
	<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 (rehab and new construction) that will be assisted through the HOME Program. As such, admin costs will be incurred in planning for HOME projects (approximately 7 households every year).
	<b>Location Description</b>	CNMI wide
	<b>Planned Activities</b>	HOME administrative and planning costs
7	<b>Project Name</b>	Homeowner Investment Partnerships (Homeowner Rehabilitation)
	<b>Target Area</b>	Saipan Tinian Rota
	<b>Goals Supported</b>	Sustain Affordable Housing Stock Promote Fair Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$281,099.86
	<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: \$115,732.15+ \$165,367.71 (50% of PI) = \$281,099.86; Project meets goal #4- To sustain the affordable housing stock
	<b>Target Date</b>	9/30/2025

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	To assist up to 3 households in Year 2 of the Consolidated Plan. NMHC will determine, depending on funding availability, the number of homes to be constructed or purchased with HOME funds (using PY funding)
	<b>Location Description</b>	CNMI wide
	<b>Planned Activities</b>	Homeowner rehabilitation
8	<b>Project Name</b>	Homeowner Investment Partnerships Program (Homebuyer/New Construction)
	<b>Target Area</b>	Saipan Tinian Rota
	<b>Goals Supported</b>	Expand Housing Stock Promote Fair Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$396,200.01
	<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 (1) units (up to 2 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: \$230,832.30 + \$165,367.71 (50% of PI) = \$396,200.01; Project meets goal #5- To expand the affordable housing stock
	<b>Target Date</b>	9/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	To assist up to 3 households in Year 2 of the Consolidated Plan. NMHC will determine, depending on funding availability, the number of homes to be constructed or purchased with HOME funds (using PY funding)

	<b>Location Description</b>	CNMI wide
	<b>Planned Activities</b>	Homebuyer/New Construction for first time homeowners
9	<b>Project Name</b>	HESG24 Commonwealth of the Northern Mariana Islands
	<b>Target Area</b>	CNMI Wide
	<b>Goals Supported</b>	Community Enhancement Provide Services to the Homeless
	<b>Needs Addressed</b>	Homelessness
	<b>Funding</b>	ESG: \$81,210.00
	<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 and homelessness prevention funds. In order for the households to be assisted, planning and admin costs will be incurred. Allocation breakdown is as follows: \$25,239.75 (housing relocation and stabilization services); \$8,000 (HMIS); Planning and Admin-\$6,090.75 (allocated to NMHC); \$25,127.70 (rapid re-housing assistance) and \$16,751.80 (homelessness prevention assistance). The total allocation breakdown equates to \$81,210 (ESG funded amount. Project meets goal #10- To provide services to the homeless. EligibilityCitation: 24 CFR 576.106,107,108.
	<b>Target Date</b>	09/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	4 households assisted with rapid rehousing funds 2 households assisted with homelessness prevention funds
<b>Location Description</b>	Assistance will be provided to families who qualify for ESG. With the help of the case manager, the applicant will select a unit (owned by a private landlord). The units will be scattered within Saipan, Tinian, or Rota therefore, there is no particular address where activities will be undertaken. NMHC's main office is located in Garapan, Saipan.	

	<b>Planned Activities</b>	To provide rapid rehousing and homelessness prevention services which includes up to 12 months' rental assistance, security and utility deposit, and up to 12 months' utility allowance for households who qualify for the assistance. In addition, funds will be used for the HMIS, planning and admin, and housing relocation and stabilization services
10	<b>Project Name</b>	Alternate Projects (TBD)
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	
	<b>Description</b>	
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	

## **AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)**

### **Will the state help non-entitlement units of the general local government to apply for Section 108 loan funds?**

The CNMI has been informed about the Section 108 Loan Guarantee Program and how this funding can assist applicants with a larger funding amount and greater flexibility. However, at this time, the CNMI is actively engaged in other federal and local funding initiatives aimed at supporting economic development and infrastructure projects.

### **Available Grant Amounts Is**

Currently five times the annual allocation amount which is approximately \$4.9M.

### **Acceptance process of applications**

At this time, the CNMI has not identified a specific project to avail of this program.

## AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)

### Will the state allow units of general local government to carry out community revitalization strategies?

The Commonwealth of the Northern Mariana Islands (CNMI) does not have a formal Community Revitalization Strategy (CRS) policy in place as defined by HUD. However, the CNMI is open to allowing units of general local government to propose and implement community revitalization strategies in the future, provided they align with the goals and priorities outlined in the Consolidated Plan. While there is no single, officially designated CRS policy, various initiatives and programs across the CNMI collectively support community revitalization efforts.

#### Key Initiatives:

1. Comprehensive Sustainable Development Plan (CSDP): This plan, developed under Public Law 20-20 and finalized in 2021, provides strategic guidance for sustainable development in the CNMI. It includes goals and objectives across four themes: socioeconomic development, the built environment, natural resources, and disaster risk reduction, aiming to support community revitalization through sustainable practices.
2. Community Development Block Grant - Disaster Recovery (CDBG-DR) Program: Administered by the Northern Marianas Housing Corporation (NMHC), this program focuses on disaster recovery and includes policies and procedures for housing, infrastructure, and economic development. While not exclusively a community revitalization strategy, it contributes to rebuilding and enhancing communities affected by disasters.
3. Garapan Revitalization Project: In partnership with various stakeholders, this project aims to revitalize the Garapan Core area, transforming it into a vibrant destination for shopping, dining, festivals, and evening activities. The project reflects community input and focuses on economic development and cultural preservation.

These initiatives, among others, demonstrate the CNMI's commitment to community revitalization through strategic planning, sustainable development, and active community engagement.

#### State's Process and Criteria for approving local government revitalization strategies:

The Commonwealth of the Northern Mariana Islands (CNMI) does not have a formal, HUD-defined Community Revitalization Strategy (CRS) policy. However, the CNMI supports local government revitalization initiatives through various planning frameworks and approval processes.

## State-Level Planning Frameworks

1. **Comprehensive Sustainable Development Plan (CSDP):** This plan, developed under Public Law 20-20 and finalized in 2021, outlines strategic guidance for sustainable development in the CNMI. It includes goals and objectives across four themes: socioeconomic development, the built environment, natural resources, and disaster risk reduction, aiming to support community revitalization through sustainable practices.
2. **Comprehensive Economic Development Strategy (CEDS):** Managed by the CNMI Department of Commerce and updated by the Office of Planning and Development (OPD), the CEDS is a 5-year economic development plan that identifies investment priorities and projects of significance to the CNMI. The public is encouraged to provide feedback on proposed projects, which are intended to advance long-term economic recovery, development, and resiliency.

## Local Government Involvement

While there is no singular CRS policy, local governments, including mayors and municipal councils, play a role in community revitalization efforts:

1. **Mayoral Responsibilities:** Mayors serve on the Governor's Council and are responsible for administering government programs, public services, and appropriations for their respective islands. They coordinate federal programs extended to their areas and act as principal local officials for coordinating disaster control activities.
2. **Community Engagement:** The Northern Marianas Housing Corporation (NMHC) emphasizes citizen participation in the planning, implementation, and assessment of its Community Development Block Grant-Disaster Recovery (CDBG-DR) Program. This includes providing adequate information and opportunities for citizens to comment, ensuring a responsive housing and community development effort.

## Approval Process for Local Revitalization Strategies

The approval process for local revitalization strategies involves several steps:

1. **Proposal Submission:** Local governments or entities submit revitalization proposals to the Office of Planning and Development (OPD) or relevant agencies.
2. **Alignment with State Plans:** Proposals are reviewed to ensure alignment with state-level planning frameworks such as the CSDP and CEDS.

3. Public Participation: Public hearings and community engagement activities are conducted to gather input and ensure transparency.
4. Approval: Final proposals are submitted to the Governor's Council and may require approval from the Governor and the Legislature, depending on the scope and funding requirements.

This process ensures that local revitalization strategies are coordinated with state priorities and have community support.

## AP-50 Geographic Distribution – 91.320(f)

### Description of the geographic areas of the state (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.

#### Geographic Distribution

Target Area	Percentage of Funds
Saipan	75
Tinian	0
Rota	25

Table 62 - Geographic Distribution

#### Rationale for the priorities for allocating investments geographically

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

#### Discussion

In the CNMI, the geographic distribution of federal funds is carefully planned to address the unique needs of each island. Through coordinated efforts by various agencies, resources are allocated to ensure balanced development, disaster recovery, and equitable access to essential services across Saipan, Tinian, and Rota. Geographic distribution is also contingent on each island's project application and priority of these projects.

## Affordable Housing

### AP-55 Affordable Housing – 24 CFR 91.320(g)

#### Introduction:

The figure below represents the number of units to be funded with ESG and HOME funds.

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

**Table 64 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	6
The Production of New Units	1
Rehab of Existing Units	3
Acquisition of Existing Units	0
Total	10

**Table 65 - One Year Goals for Affordable Housing by Support Type**

#### Discussion:

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

## **AP-60 Public Housing - 24 CFR 91.320(j)**

### **Introduction:**

In the CNMI, public housing is administered by the Northern Marianas Housing Corporation (NMHC), which serves as both the Public Housing Agency (PHA) and the lead entity responsible for the administration of HUD-assisted housing programs. NMHC operates public housing units, manages the Housing Choice Voucher (Section 8) Program, and implements housing rehabilitation and development initiatives.

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

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

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

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

NMHC staff under the Asset Management Division and Field Offices continue to conduct outreach efforts to residents/tenants under the Section 8 Housing Assistance Payments 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. Conduct resident/tenant surveys and needs assessments to identify priorities for services, improvements, and resident driven initiatives.

### **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:**

NMHC's public housing strategy aligns with the goals outlined in the CNMI's Consolidated Plan, which is developed in compliance with HUD regulations, including 24 CFR § 91.320(j). The strategy focuses on:

- **Increasing the Availability of Affordable Housing:** Through the development and rehabilitation of public housing units, NMHC aims to expand the stock of affordable housing in the CNMI.
- **Improving Housing Quality and Sustainability:** Efforts are made to enhance the quality of existing housing units through maintenance and rehabilitation programs.
- **Promoting Self-Sufficiency:** Programs like the Family Self-Sufficiency Program encourage residents to achieve economic independence through education, job training, and employment opportunities.

## **AP-65 Homeless and Other Special Needs Activities – 91.320(h)**

### **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 the near future, and if granted CoC funding, will be implementing a CoC program. Homelessness has been rapidly growing in recent years which prompted the CNMI to shift from funding shelter operations to rapid re-housing and homelessness prevention activities since 2011. Through the PIT count conducted in January 2020, a total of 302 households, comprising 1,307 persons were found to be homeless or at risk of homelessness .

However, there continues to be a significant demand for housing assistance due to the recent disasters that made landfall in 2015 and 2018, sudden loss of jobs, overcrowding in homes, exorbitant costs of utilities, substandard housing, etc. There is no specific program specifically targeting veterans, and currently, there are no transitional or supportive housing programs in the CNMI. The NMHC, through the Section 8 Programs and ESG, is the only agency in the CNMI that provides housing assistance for more than a month's time. There are about 700+ households on the waiting list.

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

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

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

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

**As a goal in the next five years, plans to** Support financing of transitional housing to provide temporary housing for homeless individuals, including those who are transitioning from drug rehabilitation centers and prison and support financing the construction of an emergency shelter to provide temporary housing for those who are seeking shelter from a disaster or who find themselves temporarily homeless.

NMHC hoped to build one or both types of projects starting PY 2025 (emergency shelter or transitional housing facilities or both) but funding was inadequate.

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

All the actions above address this section.

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

All the actions above address this section.

## **Discussion**

The CNMI currently does not receive HOPWA funds. To address the above sections pertaining to the subpopulations, NMHC established partnerships with the following agencies: Department of Fire and Emergency Management Services, Department of Public Safety, the judiciary system (Family Court), Karidat Social Services, Office of Vocational Rehabilitation, Council on Developmental Disabilities, Department of Community and Cultural Affairs, and the Community Guidance Center to accomplish the following: address the increasing homeless problem in the CNMI, involvement in the PIT survey, and hopefully, successfully implement a CoC in the CNMI. Currently, the CNMI does not have programs for individuals being discharged from publicly funded institutions and systems of care, as traditionally, the families of such individuals take them in and provide assistance in any way possible. The DYS Shelter provides housing for runaway youth, neglected and abused youth, and youth who are victims of domestic violence (and therefore are homeless due to their situations). The Guma Espersansa Shelter provides housing to women and children who are victims of domestic violence. For the subpopulations transitioning of these shelters, as mentioned, traditionally, the families of such individuals take them in and provide assistance in any way possible. For those formerly homeless and assisted through the ESG Program, NMHC's case managers, ensures that the households (most of whom are special needs households) 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.

**Discussion:**

Despite these significant barriers, the CNMI is taking proactive steps to create a more inclusive and sustainable housing market. By working in collaboration with federal agencies, private developers, financial institutions, and local communities, the government is committed to overcoming these obstacles and creating affordable housing opportunities for its residents. Through these ongoing and planned initiatives, the CNMI aims to reduce the barriers to affordable housing and create a more resilient housing market for the future.

## **AP-75 Barriers to affordable housing – 91.320(i)**

### **Introduction:**

The CNMI faces several significant barriers to the development and accessibility of affordable housing. These barriers are multi-faceted and involve challenges related to the local economy, infrastructure, land use policies, high construction and labor costs and environmental factors. Despite these challenges, the CNMI is committed to overcoming these barriers and improving access to affordable housing for low-and moderate-income residents.

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

Actions: 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.

## **AP-85 Other Actions – 91.320(j)**

### **Introduction:**

The CNMI is committed to addressing the ongoing challenges related to affordable housing, homelessness, and overall community development. In addition to the strategies outlined throughout the Consolidated Plan, the CNMI will continue to implement specific actions to further its housing and community development goals. These actions include leveraging federal resources, enhancing coordination with local organizations, addressing housing and infrastructure needs, and expanding economic opportunities.

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

### **Actions planned to address obstacles to meeting underserved needs**

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

### **Actions planned to foster and maintain affordable housing**

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

### **Actions planned to reduce lead-based paint hazards**

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.

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

2. 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**

- Collaborate with the Department of Labor, the Community Development Institute of the Northern Marianas College, the Northern Marianas Technical 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.
- 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 Programs.
- 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.
- 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.
- Work proactively with current Section 8 households in 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**

NMHC's management and Board of Directors perform to improve processes in the programs. In addition, management of CPD funded subrecipients perform 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 NMHC to continuously work with the Administration and the Mayors of Saipan, Tinian, and Rota to identify community planning and development and housing needs. One of the housing unmet needs is the availability of affordable, rental housing units in the CNMI. Due to the devastation of Super Typhoon Yutu in October 2018 and the significant number of families whose homes were destroyed and most of those families seeking rental units, it has been a challenge to identify available and affordable rental units in the CNMI for the past years. Because of this, NMHC has worked collaboratively with government and non-profit agencies, took the lead in the Housing Task Force and continues 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**

**Discussion:**

The CNMI recognizes that effective coordination between public and private housing agencies, as well as social service organizations, is essential to address the complex and interconnected needs of the population, particularly underserved groups such as low-income residents, the elderly, individuals with disabilities, and the homeless. Coordination ensures that resources are used efficiently, and that the delivery of housing and social services is holistic, integrated, and responsive to the needs of the community.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

#### Introduction:

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.320(k)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	15,817
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>15,817</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

**HOME Investment Partnership Program (HOME)**  
**Reference 24 CFR 91.320(k)(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:

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

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

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

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

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

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

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

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

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

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).
6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).
7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

**Emergency Solutions Grant (ESG)  
Reference 91.320(k)(3)**

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

See Appendix I for the written standards for providing ESG assistance.

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

The CNMI does not have a centralized or coordinated assessment system. All referrals for housing assistance from other organizations are transmitted to NMHC for assistance.

3. Identify the process for making sub-awards and describe how the ESG allocation is available

to private nonprofit organizations (including community and faith-based organizations).

The NMHC will publish a notice in the newspapers soliciting proposals for 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 in proponents. Once the proposals are submitted, the evaluation committee comprised of (8) members ((3) of which are Board of Directors from each jurisdiction) select a proposal based on the following:

- The applicant’s history of providing effective shelter or prevention services to the homeless, and of successfully operating performance-based grant-funded programs
  - The applicant’s effective coordination with organizations in their local “continuum of care”, to address identified gaps in services for the homeless and improve outcomes for participants
  - The applicant’s ability to transition street or unsheltered homeless participants or shelter residents to permanent housing, and/or prevent homelessness for families and individuals who are at risk of homelessness.
4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and 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 ESG. The following factors are considered in selecting a homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services under ESG:

- 1) Mental capacity / ability to make sound decisions
  - 2) Capability (will be determined through re-evaluations conducted by Subgrantee) to maintain housing stability after assistance
  - 3) Compliance with the program regulations during the individual’s assistance period
5. Describe performance standards for evaluating ESG.

The following performance standards are as follows: reduction in the number of homeless

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: the 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.

**Housing Trust Fund (HTF)**  
**Reference 24 CFR 91.320(k)(5)**

1. How will the grantee distribute its HTF funds? Select all that apply:
2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".

The CNMI is not administering the HTF Program in PY 2025.

3. If distributing HTF funds by selecting applications submitted by eligible recipients,
  - a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".
  - b. Describe the grantee's application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".
  - c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

d. Describe the grantee's required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

e. Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

**6. Performance Goals and Benchmarks.** The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

**7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds.**

Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

**8. Rehabilitation Standards.** The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; Capital Needs Assessments (if applicable); and broadband infrastructure (if applicable).

**9. Resale or Recapture Guidelines.** Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

**10. HTF Affordable Homeownership Limits.** If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

The grantee has determined its own affordable homeownership limits using the methodology described in § 93.305(a)(2) and the limits are attached.

**11. Grantee Limited Beneficiaries or Preferences.** Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the grantee will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A."

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

**12. Refinancing of Existing Debt.** Enter or attach the grantee's refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter "N/A."

**Discussion:**

## Appendix - Alternate/Local Data Sources

Sort order	Type	Data Source Name	List the name of the organization or individual who originated the data set.	Provide a brief summary of the data set.	What was the purpose for developing this data set?	Provide the year (and optionally month, or month and day) for when the data was collected.	Briefly describe the methodology for the data collection.	Describe the total population from which the sample was taken.	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.	How comprehensive is the coverage of this administrative data? Is data concentrated in one geographic area or among a certain population?	What time period (provide the year, and optionally month and day) is covered by this data set?	What is the status of the data set (complete, in progress, or planned)?
<TYPE=[pivot_table] VERSION=[2] REPORT_GUID=[884DC1E44796F035A521FE96F1A3ABF2]>												

# 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 Mariana Islands is hereby submitting its First Year Annual Action Plan (Program Year 2025) which covers October 1, 2025 – September 30, 2026. The Plan outlines the planned uses and goals for CDBG, HOME, ESG, HTF 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 Arnold I. Palacios, 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 A: House Joint Resolution, authorizing the CNMI to submit its Annual Action Plan for PY 2025.

### 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 also indicated in the Program Year 2025-2029 Five Year Consolidated Plan. The goals are:

- Promote Fair Housing
- Special Needs and Low-Moderate Income Housing- new construction and acquisition of housing, rehabilitation of housing, implementation of energy-efficient features for housing

- Public Facilities and Improvements- fire stations and fire trucks (inclusive of life saving equipment), recreational facilities, youth centers and convention centers (equally prioritized), sports facilities
- Public Services – healthcare, services for senior citizens, public safety services, substance abuse programs, recreational programs
- Job Creation/Retention – promote employment opportunities for persons with disabilities, support micro businesses through loans or grants
- Emergency Shelter/Transitional Housing: typhoon shelters, homeless shelters and transitional housing
- Emergency Rental Assistance: homeless prevention assistance (at-risk families), rapid re-housing (literally homeless families) and food pantry program
- Disaster Recovery- construction or rehabilitation of homes, Infrastructure improvements, economic development activities and debris removal

### **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 \$13M in CDBG funds to support the various CDBG community projects that have benefited the islands’ various populations. Over the past 5 years, through the CPD programs, the CNMI has contributed to the rehabilitation of public facilities which encourages community involvement and enhancement, purchase of fire protection and life-saving equipment, increased the fleet of fire pumper trucks in the CNMI, and provided funding for debris removal on all three islands shortly after Super Typhoon Yutu, which was absolutely critical for CNMI residents, in order to prevent health and safety hazards. In addition to its public facilities and improvement projects, the CNMI has supported organizations providing various community enrichment services that aim to improve the living conditions of families living in impoverished neighborhoods and to provide rapid rehousing and homelessness prevention assistance to families who are literally homeless and at the verge of homelessness. In addition to the islands’ public facilities and improvement projects, the CNMI has injected about \$6M of HOME funds to construct affordable housing for eligible homebuyers, acquire and rehabilitate units and placed them back into service as affordable housing for eligible homebuyers, and provide low-interest or deferred loans to assist low-and very-low-income homeowners to rehabilitate their homes and bring their primary residence to local building code standards. Lastly, the CNMI has utilized its Emergency Solutions Grant to provide rapid re-housing and homeless prevention for literally homeless or at-risk of homelessness households. For the past four years (2011 transition from the emergency shelter grant to the emergency solutions grant), the CNMI has injected about \$675K of ESG monies to homelessness

and rapid re-housing services, in addition to implementing the Homeless Management Information System in the CNMI to better track and monitor HESG-assisted families.

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

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 islands' policies and procedures for public involvement in the Consolidated Plan process and the use of Community Development Block Grant (CDBG), HOME Investment Partnerships Grant (HOME), Housing Trust Fund (HTF), 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 of low-and moderate-income people, especially those living in low-and moderate-income neighborhoods. According to the CNMI's Citizen Participation Plan, Annual Action and Consolidated Plans must be made available for a total of 30 days for the public to provide comments. In addition, the CNMI provides the general public a fifteen (15)-day notice before informing them of the public hearings to be held on the islands of Saipan, Tinian, and Rota to discuss the Five-Year Consolidated Plan and Annual Action Plan. Please see **Appendix B: Citizen Participation Plan**. Consultations, in preparation for the Consolidated Plan were conducted, to solicit for comments, input, and recommendations on the priorities, goals, and objectives for the next five years. NMHC conducted several, physical meetings with various agencies, individuals, Legislators, the Mayors of all CNMI jurisdictions, and its Board of Directors to accomplish such. In addition, the AAP was made available from July 27, 2025 to July 29, 2025. See public notices- **Appendix C**. The notices for public hearings were published on June 27, 2025, July 11, 2025 and July 25, 2025 and the hearings held on July 14, 2025 for Saipan, Rota, and Tinian. The CNMI also published an advertisement on the island's newspaper of general circulation and also published the Plans on NMHC's website, the Office of the Governor's website, and was made available, upon request. No one from the public was in attendance in the public hearings on all three islands. The Planner was assigned to conduct the hearings. A total of (1) NMHC Staff was present on Tinian, (1) NMHC staff was present on Rota, and the (2) NMHC Staff (inclusive of Planner) were present in the Saipan hearing. See Appendix C-1, C-2, and C-3 for attendance sheets.

#### **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.

No public comments were received.

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

No public comments were received.

**7. Summary**

No public comments were received.

**PR-05 Lead & Responsible Agencies - 91.300(b)**

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

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

Agency Role	Name	Department/Agency
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
HTF Administrator	NORTHERN MARIANA ISLANDS	Community Planning and Development Division

**Table 1 – Responsible Agencies**

**Narrative**

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**

Zenie P. Mafnas, (Corporate Director (Oversees all HUD funded Programs)

Jesse S. Palacios, Deputy Corporate Director; Tricia B. Tenorio, Planner ; Brandy Gonzales, Planning and Administrative Assistant; Jacob Muna, Office Manager/Procurement Officer (CDBG, HTF, and HESG Programs)

Christopher Pangelinan, Mortgage and Credit Manager (HOME and HOME-ARP Program)

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

## **AP-10 Consultation - 91.110, 91.300(b); 91.315(l)**

### **1. Introduction**

The CNMI works closely with various public and private agencies to address the needs of low-mod income persons and the special needs populations. Although the CNMI currently does not have a Continuum of Care Program in place, NMHC coordinates the delivery of services with agencies such as the Northern Marianas Protection and Advocacy Systems (NMPASI), Karidat Social Services, Department of Community and Cultural Affairs- Division of Youth Services, Council on Developmental Disabilities, Office of Vocational Rehabilitation, Center for Living Independently, Community Guidance Center, and the Department of Public Health. These agencies respond to the needs of youth, families, and adults. Needs may vary from employment, independent life skills, health and mental health, and financial needs. During the March 2024 CPD Briefing, in preparation of the 2025-2029 Consolidated Plan (this AAP represents the First of the Consolidated Plan) government and non-profit organizations were invited to attend and were encouraged to provide input verbally, through a comprehensive survey, and an activity, so that NMHC could gather information, as to the type of needs that NMHC could potentially address within the next five years.

### **Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies**

The CNMI coordinated with the Mayors of all CNMI jurisdictions, the 24th CNMI Legislature, the 24th Senate, various government agencies, non-profit organizations, by discussing the various community needs in the community to include those of homeless persons, non- homeless special needs persons, and public housing residents. Relevant State plans were reviewed to gather information to substantiate the priorities and goals of this Consolidated Plan. Efforts were made to identify the needs of the islands' varying population. Information obtained in this Plan was derived from various State Plans, consultation with various groups and agencies, and the U.S. Census Bureau. This Plan will be made available for public review and comment from June 27, 2025 to July 29, 2025. The public is encouraged to submit oral or written comments which must be received by the Northern Marianas Housing Corporation no later than 4:30 p.m., July 29, 2025. The public hearing will be held in July 14, 2025, to inform the public about this Plan. NMHC will also solicit for comments at the public hearings from the islands.

### **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**

Referrals from various social service agencies are often referred to NMHC to address the needs of homeless persons. Currently, coordinated entry is conducted by Micronesian Legal Services, Division of Youth Services, Karidat Social Services and the Northern Marianas Coalition Against Domestic Violence and Sexual assault, under the Emergency Housing Choice Voucher Program (Section 8). If a client is ineligible in the EHV Program, they are informed about the HESG Program.

The CNMI currently does not have a Continuum of Care (CoC) Program in place. However, in March of 2025, the Northern Marianas Housing Corporation (NMHC) collaborated with government, private, and non-profit organizations to form what is now called the “CNMI Homeless Prevention Coalition.”

The coalition’s primary goal is to obtain funding from the U.S. Department of Housing and Urban Development (HUD) through the CoC Program for the following services: outreach; case management; job search assistance; rapid rehousing rental assistance; Homeless Management Information System (HMIS) implementation; and referrals to mainstream services (e.g., health care, Medicaid, etc.). A key priority of the coalition is to provide rapid re-housing assistance to homeless families and individuals, with the goal of helping participants gain employment and achieve stable housing before exiting the program.

In efforts to revive the PIT count and move closer to establishing a formal CoC, NMHC met with the Commonwealth Healthcare Corporation (CHCC), WestCare, and the Office of the Governor to reinstate discussions and planning. Each agency brings specialized services that are vital to a coordinated response to homelessness. CHCC contributes public health expertise, behavioral health services, and access to medical and mental health care for individuals experiencing homelessness. WestCare offers experience in substance use treatment, crisis response, outreach to high-risk populations, and wraparound services that align with CoC program goals. The Office of the Governor provides critical policy support, interagency coordination, and leadership in aligning housing and health initiatives at the commonwealth level. Through this multi-agency collaboration, the CNMI aims to strengthen its data collection efforts, improve service delivery systems, and expand access to essential housing and support services for vulnerable populations.

Since 2019, NMHC has directly administered the Homelessness Emergency Solutions Grant (HESG) Program, providing housing relocation and stabilization services for individuals in need of rapid rehousing and homelessness prevention assistance. NMHC also conducts follow-up evaluations to ensure that families receiving assistance are able to maintain stable housing after the 12-month support period ends.

Furthermore, the Guma Esperansa Domestic Violence Shelter serves women and children who are victims of domestic violence, and the Division of Youth Services Shelter provides safe housing for children and youth who are victims of abuse and neglect—both of which are considered homeless populations due to their circumstances. Although veterans have accessed services through the ESG

Program, there is currently no dedicated program for homeless veterans in the CNMI, such as the HUD-VASH program.

**Describe consultation with the Continuum(s) of Care that serves the State 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 publishes notices on all media outlets regarding the availability of funds for the public to participate in the comment process of how the CNMI should allocate its HESG funding; however, no comments were received.

**2. Agencies, groups, organizations and others who participated in the process and consultations**

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

1	<b>Agency/Group/Organization</b>	Karidat Social Services
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence Services-Homeless Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically Homeless Homeless Needs- Families with Children
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Although the NMHC currently administers the HESG Program, the NMHC consults with Karidat Social Services on a frequent basis. Karidat Social Services is also engaged in discussing the effective use of Emergency Solutions Grant funds and what particular areas of the program can be improved to ensure that housing stability is achieved by the ESG-assisted household. Karidat Social Services also administers short-term rental assistance, through a DHHS grant, for homeless families who need a temporary place to stay, as they seek for permanent residence. They also provide food vouchers and donated clothing for those in need. In addition, the NMHC case worker is very much involved in the re- evaluation of the households and identifies ways the household can improve their financial status in order to continue living in safe, sanitary, and decent housing. The increased coordination with Karidat enables NMHC to improve the HESG Program every year and streamline its processes accordingly to better meet the needs of the clients.
2	<b>Agency/Group/Organization</b>	CNMI Department of Labor (DOL)
	<b>Agency/Group/Organization Type</b>	Services-Employment Other government - Local

	<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>	NMHC consults with DOL, through the Workforce Investment Agency Division, on the type of programs available for low-mod income individuals, most of whom are participants in the HUD-assisted program. DOL is the only entity in the CNMI that provides training services such as the Individual Training Program, Program of Training Services (client may obtain a certification of completion in a particular field of study, a secondary school diploma or equivalent, or employment). Anticipated outcome of the consultation is increased success rate in the FSS Program and an increase in the CNMI local workforce.
3	<b>Agency/Group/Organization</b>	Offices of the Mayor of Saipan, Rota, and Tinian
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Anti-poverty Strategy Community Needs
	<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 all (3) jurisdictions were consulted and they have demonstrated the need for mainly for public facilities, mainly recreational facilities, and infrastructure upgrades (to become more resilient) on the islands of Saipan, Tinian, and Rota, and just in the recent months, have expressed their thoughts on the need for typhoon shelters, in the times of disasters, and transitional housing for those in need of emergency shelter, as they seek for a permanent place to stay. These types of projects are being sought after to promote the local economy, health and wellness, youth activities, and public safety. Their input allows NMHC to prioritize the type of CPD projects to be funded in the next five years.
4	<b>Agency/Group/Organization</b>	American Red Cross

	<b>Agency/Group/Organization Type</b>	Services-homeless Services - Victims Agency - Emergency Management
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Disaster Management
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	As the ARC was very instrumental in providing NMHC critical disaster data shortly after Super Typhoon Yutu, there were frequent discussions with the organization throughout the recovery process to date, on the types of assistance (both at the time of the disaster and for future mitigation) necessary to meet the unmet needs of the community. ARC expressed the need for typhoon shelters, transitional/emergency housing, and most especially, to increase the rental housing stock, as a majority of the population affected by the most recent disasters were renters. Over 50% of major or destroyed homes were rental properties. The consultation and coordination, in addition to the data provided by the ARC, enabled NMHC to include concrete information in the ConPlan regarding homeless needs in the CNMI.
5	<b>Agency/Group/Organization</b>	Department of Public Health-Community Guidance Center
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Health Services - Victims Health Agency Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	NMHC consulted with the Community Guidance Center (CGC), a Division of the Department of Public Health, and have discussed potential collaboration with NMHC and about funding assistance for the Systems of Care Program administered by CGC. Systems of Care is a coordinated network of community-based services and support that is organized to meet the challenges of children and youth with serious mental health needs and their families. The consultation and coordination will help NMHC identify various needs amongst its system of care network and help us prepare for a Continuum of Care implementation, if approved by HUD.
6	<b>Agency/Group/Organization</b>	CNMI Office of Planning and Development (OPD)
	<b>Agency/Group/Organization Type</b>	Other government - Local Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Data Library Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	OPD played a critical role in the development of the Consolidated Plan. The office was created to institute an interagency framework within which OPD can support the collection of data to achieve its missions and mandates. The OPD also maintains a data library for the continual storage and collection of public information needed or utilized during the planning process. OPD drafted the Comprehensive Economic Development Strategy for the CNMI and created the Planning and Development Advisory Council to fulfill the project prioritization, planning, and data centralization mandates of Public Law 20-20. With the lack of recent data in the CNMI, OPD was able to assist in providing citizen-centric reports, updated census surveys, and other strategic plans to assist in various sections of the Consolidated Plan.
7	<b>Agency/Group/Organization</b>	Office of the Governor-Council on Developmental Disabilities
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities Other government - Local

<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Other Needs- Persons with Disabilities
<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>NMHC mainly consults with the Developmental Disabilities Council, a branch under the Office of the Governor. The DD Council's mission is to promote the independence, productivity, integration, and inclusion of those with developmental disabilities into the community, many of which qualify for HUD-assistance. DD Council and other social service providers have expressed the need for independent living centers on the islands of Tinian and Rota, just as the CDBG-funded Independent Living Center on Saipan (funded by CDBG). Other needs include job training and recreational programs for persons with disabilities. The coordination with DD Council and the data provided by the agency allows NMHC to demonstrate the need for such programs in the CNMI through the Consolidated Plan.</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 NMHC does not have a Continuum of Care in place, but the CNMI has officially created the CNMI Homeless Prevention Coalition. The goal of the coalition is to obtain funding from HUD through the CoC program for the following: outreach services; case management services; job search services; rapid rehousing rental assistance; Homeless Management Information System (HMIS) software program; and referrals to mainstream resources (e.g. health services; Medicaid, etc.). More importantly, the Coalition would like to focus on providing rapid re-housing services to the homeless families and individuals.
Community Services Block Grant 2024 State Plan	Department of Community and Cultural Affairs	The goals of the State Plan include the continued support of activities designed to assist low income families and individuals, homeless families and individuals, and elderly low income individuals and families.
Workforce Investment Opportunity Act (FY 2024- 2027)	CNMI Department of Labor- Workforce Investment Agency	The goals of the State Plan is the continuous improvement of job, education and training services through collaborative partnerships with government agencies, private businesses, and CNMI workers to fully recognize the importance of education, training, and economic development, and in turn, help the low income family and individual become self-sufficient.
CNMI Four Year State Plan on Aging (2023-2027)	Department of Community and Cultural Affairs	The goals of the State Plan address the needs of the islands' elderly population to include public facilities and improvements, housing, and services to such populations.
Northern Marianas Office of Vocational Rehabilitation (2024-2027)	CNMI Office of Vocational Rehabilitation	The goals of the Strategic Plan address the housing and supportive service needs of persons with disabilities.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
CNMI Council on Developmental Disabilities State Plan (2022-2026)	CNMI Council on Developmental Disabilities	The goals of the Strategic Plan address the housing and supportive service needs of persons with disabilities.
Northern Marianas Housing Corporation PHA 5-Year Plan	Northern Marianas Housing Corporation	The goals of the Strategic Plan address the needs of Section 8 HCV and Multi-Family Program residents.
CNMI Office of Planning and Development	Green Growth Initiative (2024)	GGI is a set of development strategies focused on improving the resiliency of the built environment. Through GGI, the Pacific Islands' Government works to develop communities that maximize public health and safety, economic opportunity and lifestyle choices that can withstand changes in climate and extreme weather events to reduce societal and economic burdens of recovery.

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

**Narrative**

The CNMI’s centralized government structure allows for streamlined coordination between state-level agencies and local implementation partners. Cross-agency collaboration ensures that Consolidated Plan goals are aligned with broader development strategies, and that services reach vulnerable populations across all islands. This cooperative approach supports the effective and efficient use of federal resources in meeting the CNMI’s housing and community development goals.

## **AP-12 Participation - 91.115, 91.300(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 coordinated with the Mayors of all CNMI jurisdictions, the 24th CNMI Legislature, the 24th Senate, various government agencies, non-profit organizations, by discussing the various community needs in the community to include those of homeless persons, non-homeless special needs persons, and public housing residents. Relevant State plans were reviewed to gather information to substantiate the priorities and goals of this Consolidated Plan. Efforts were made to identify the needs of the islands' varying population. Information obtained in this Plan was derived from various State Plans, consultation with various groups and agencies, and the U.S. Census Bureau. The Plan was made available from June 27, 2025 to July 29, 2025. The public is encouraged to submit oral or written comments which must be received by the Northern Marianas Housing Corporation no later than 4:30 p.m., July 29, 2025: See public notices- Appendix C . The notices for public hearings were published on June 27, 2025, July 11, 2025, and July 25, 2025 and the hearings were held on July 14, 2025. The CNMI also published an advertisement on the island's newspaper of general circulation and also published the Plans on NMHC's website, the Office of the Governor's website, and was made available, upon request.

**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 Meeting	Non-targeted/broad community	No one was in attendance in the public hearings on all three islands. The Planner was assigned to conduct the hearings. A total of (1) NMHC Staff was present on Tinian, (1) NMHC staff was present on Rota, and (1) NMHC Staff (inclusive of the Planner) were present at the Saipan hearing. See Appendix C-1, C-2, and C-3 for attendance sheets	no comments received	n/a	

2	Newspaper Ad	Non-targeted/broad community	<p>The AAP was made available from June 27, 2025 to July 29, 2025. See public notices- Appendix C. The notices for public hearings were published on June 27, 2025, July 11, 2025, and July 25, 2025, and the hearings were held on July 14, 2025 on Saipan, Tinian, and Rota. The CNMI also published an advertisement on the island's newspaper of general circulation and also published the Plans on NMHC's website, the Office of the Governor's website, and was made available, upon request.</p>	no comments received	n/a	
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3	Internet Outreach	Non-targeted/broad community	<p>The AAP was made available from June 27, 2025 to July 29, 2025. See public notices- Appendix C. The notices for public hearings were published on June 27, 2025, July 11, 2025, and July 25, 2025, and the hearings were held on July 14, 2025 on Saipan, Tinian, and Rota. The CNMI also published an advertisement on the island's newspaper of general circulation and also published the Plans on NMHC's website, the Office of the Governor's website, and was made available, upon request.</p>	no comments received	n/a	<a href="http://www.nmhcgov.net">www.nmhcgov.net</a> , <a href="http://www.gov.mp">www.gov.mp</a>
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**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources – 91.320(c)(1,2)

#### Introduction

none

#### 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	980,125.00	24,380.95	0.00	1,004,505.95	0.00	For the PY25 Action Plan year, CDBG funds will be used for public facilities and program administration and planning.

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	407,723.00	330,735.90	0.00	738,458.90	0.00	PY 2025 HOME funds will be for homeowner rehab and new construction and program administration and planning.

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	81,210.00	0.00	0.00	81,210.00	0.00	At least 60% of ESG funding will be allocated to rapid re- housing activities while 40% of ESG funding will be used for homelessness prevention activities (calculated after percentages have been set aside for program administration (7.5%) and HMIS. NMHC will focus on assisting the literally homeless households, since it's a rapidly growing problem in the CNMI.

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: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	0.00	0.00	0.00	0.00	0.00	The CNMI will not implement the HTF Program in PY 2025.

Table 1 - Expected Resources – Priority Table

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

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

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

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. The island of Saipan has a land area of 11,913 hectares, of which 51% is public land. The island of Tinian has a land area of 10,177 hectares, of which 90% is public land, and the US Military is leasing 68% of the public land. The island of Rota has a land area of 8,693 hectares, of which 72% is public land. The Northern Islands has a land area of 13,307 hectares, of which 100% is public land.

**Discussion**

none

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Infrastructure Improvement	2025	2029	Non-Housing Community Development	Saipan Tinian Rota	Non Housing Community Development	CDBG: \$980,125.00	Other: 1 Other
2	Job Creation/Retention	2025	2029	Non-Housing Community Development Economic Development	Saipan Tinian Rota	Non Housing Community Development	CDBG: \$980,125.00	Other: 1 Other
3	Public Services	2025	2029	Non-Housing Community Development	Saipan Tinian Rota	Non Housing Community Development	CDBG: \$980,125.00	Other: 1 Other
4	Sustain Affordable Housing Stock	2025	2029	Affordable Housing Homeless	Saipan	Affordable Housing	HOME: \$407,723.00	Rental units rehabilitated: 2 Household Housing Unit
5	Expand Housing Stock	2025	2029	Affordable Housing Non-Homeless Special Needs	Saipan Tinian Rota	Affordable Housing	HOME: \$407,723.00	Homeowner Housing Added: 4 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Emergency Shelter/Transitional Housing	2025	2029	Homeless Non-Housing Community Development	Saipan	Non Housing Community Development	CDBG: \$980,125.00	Other: 1 Other
7	Public Facilities and Improvements	2025	2029	Non-Housing Community Development	Saipan Tinian Rota	Non Housing Community Development	CDBG: \$980,125.00	Other: 2 Other
8	Promote Fair Housing	2025	2029	Affordable Housing Homeless Non-Homeless Special Needs	Saipan Tinian Rota	Non Housing Community Development	CDBG: \$980,125.00	Other: 2 Other
9	Community Enhancement	2025	2029	Affordable Housing Homeless Non-Homeless Special Needs	Saipan Tinian Rota	Non Housing Community Development	CDBG: \$980,125.00	Other: 3 Other
10	Provide Services to the Homeless	2025	2029	Homeless	Saipan	Homelessness	ESG: \$81,210.00	Tenant-based rental assistance / Rapid Rehousing: 4 Households Assisted Homelessness Prevention: 2 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11	Disaster Recovery	2025	2029	Affordable Housing Non-Housing Community Development	Saipan Tinian Rota	Non Housing Community Development Affordable Housing		Rental units constructed: 13 Household Housing Unit Rental units rehabilitated: 10 Household Housing Unit Homeowner Housing Added: 67 Household Housing Unit Homeowner Housing Rehabilitated: 33 Household Housing Unit Other: 3 Other

Table 2 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	Infrastructure Improvement
	<b>Goal Description</b>	<ul style="list-style-type: none"> <li>• Construct infrastructure to support housing</li> <li>• Improve infrastructure to support housing</li> <li>• To improve infrastructure to strengthen resilience to mitigate potential disaster damage</li> </ul> <p>*Figure below represents anticipated # of projects for next year from PY 2025-2029</p>
2	<b>Goal Name</b>	Job Creation/Retention

	<b>Goal Description</b>	<ul style="list-style-type: none"> <li>Promote employment opportunities for persons with disabilities</li> <li>Support micro-businesses with loans or grants</li> </ul> <p>*Figure below represents the # of projects per year STARTING PY 2022 - 2024</p>
3	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	<p>To support projects particularly related to healthcare, recreational programs, service for senior citizens, substance abuse programs, and fire and emergency medical services</p> <p>*figure below represents the # of projects per year</p>
4	<b>Goal Name</b>	Sustain Affordable Housing Stock
	<b>Goal Description</b>	<ul style="list-style-type: none"> <li>Assist very low- and low-income homeowners to sustain the physical and economic life to their homes, to meet current building code standards, and/or modify to ADA standards</li> <li>Support any HUD-financing program that sustains the affordable housing stock in the CNMI</li> </ul> <p>*NMHC inputted the annual HOME allocation and HOME program income below. For next year alone, however, NMHC anticipates to fund at least (4) rehab and/or reconstruction projects withHOME</p>
5	<b>Goal Name</b>	Expand Housing Stock
	<b>Goal Description</b>	<ul style="list-style-type: none"> <li>Support any HUD financing program that expands the stock of affordable housing in the CNMI.</li> <li>Assist very low and low income first time home-owners to construct or acquire a safe, affordable home</li> </ul> <p>*NMHC inputted the annual HOME allocation and program income in the "funding allocated" section below. For next year alone, however, NMHC anticipates to fund at least (4) new construction and/or acquisition projects with HOME funds per year.</p>
6	<b>Goal Name</b>	Emergency Shelter/Transition al Housing

	<b>Goal Description</b>	<ul style="list-style-type: none"> <li>● Support financing of transitional housing to provide temporary housing for homeless individuals, including those who are transitioning from drug rehabilitation centers and prison</li> <li>● Support financing the construction of an emergency shelter to provide temporary housing for those who are seeking shelter from a disaster or who find themselves temporary homeless</li> </ul> <p>*Figure below represents the # of projects per year starting PY 2025-2029</p>
7	<b>Goal Name</b>	Public Facilities and Improvements
	<b>Goal Description</b>	<p>To acquire, construct, or rehabilitate facilities for low-moderate income communities and special needs populations</p> <ul style="list-style-type: none"> <li>● Sports and Recreational Facilities</li> <li>● Community Centers</li> <li>● Facilities that improve services to the general public</li> <li>● Youth Centers</li> <li>● Community Centers</li> </ul> <p>*Figure below represents the # of projects per year</p>
8	<b>Goal Name</b>	Promote Fair Housing
	<b>Goal Description</b>	<p>Identify and address barriers to fair housing</p> <p>*Figure below represents the # of workshops to be held each year to identify and address the barriers to fair housing</p>
9	<b>Goal Name</b>	Community Enhancement
	<b>Goal Description</b>	<ul style="list-style-type: none"> <li>● Operational support of facilities providing services to special needs population</li> <li>● Support the work of organizations that aim to reduce homelessness</li> </ul> <p>*Figure below represents the # of projects per year</p>
10	<b>Goal Name</b>	Provide Services to the Homeless

	<b>Goal Description</b>	<ul style="list-style-type: none"> <li>● Provide Operations Support for programs serving homeless persons, disabled persons, and those with special needs.</li> <li>● Support programs addressing poverty for income eligible individuals, specifically those who are homeless or at-risk of homelessness</li> </ul>
<b>11</b>	<b>Goal Name</b>	Disaster Recovery
	<b>Goal Description</b>	<p>To allocate CDBG-DR funding to Housing, Infrastructure and Economic Development to ensure added resiliency in future, potential disasters.</p> <p>"Funding allocated" below is left blank, since funds will come from the CDBG-DR Program in the amount of \$243,946,000. For the purpose of this goal, NMHC included all other details in this section of the Action Plan. The figure in "other" below represents the anticipated# of infrastructure projects per year. All other figures are merely estimates.</p>

**AP-25 Allocation Priorities – 91.320(d)**

**Introduction:**

**Funding Allocation Priorities**

Program	Jurisdiction (S)		
CDBG	100% Saipan		
HOME	CNMI Wide - Saipan, Tinian, and Rota		
HOPWA	N/A		
ESG	CNMI Wide - Saipan, Tinian, and Rota		

**Table 3 – Funding Allocation Priorities**

**Reason for Allocation Priorities**

**How will the proposed distribution of funds address the priority needs and specific objectives described in the Consolidated Plan?**

Through the CDBG Program, funds will be allocated to construct and/or rehabilitate public facilities and improve services for the general public. The HESG Program will focus on providing rental assistance to low- and extremely low-income families in the CNMI, supporting the goal of reducing homelessness in the region. Meanwhile, the HOME Program will create homeownership opportunities and help sustain the growing stock of affordable housing in the CNMI.

## **AP-30 Methods of Distribution – 91.320(d)&(k)**

### **Introduction:**

CDBG Projects are selected by a committee who reviews the project proposals and evaluates the projects based on a set criteria. Projects who receive the highest points will be selected. In the HESG Program, households are selected based on a first come, first serve basis and are assessed thoroughly. Households who meet eligibility will be assisted through the HESG rental program. As with the HOME Program, assistance is based on a first come, first serve basis. Households who meet the eligibility criteria will be assisted through the program. All program requirements must be adhered to, inclusive of submitting the proper documentation to avail of assistance.

### **Distribution Methods**

State Program Name:	Fund	Describe the state program addressed by the Method of Distribution.	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	Describe how resources will be allocated among funding categories.	Describe threshold factors and grant size limits.	What are the outcome measures expected as a result of the method of distribution?
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**Table 4 - Distribution Methods by State Program**

**Discussion:**

## AP-35 Projects – (Optional)

### Introduction:

In the table below, you will find the selected projects for Program Year 2025, based on an evaluation conducted by the CDBG Selection committee, composed of the Planning and Admin Assistant, (3) managers, and (3) Board members on April 11, 2025. Based on a set criterion (CDBG Program), the projects were evaluated and selected based on a point system (20% is automatically set-aside for planning and administrative costs): In addition to the CDBG Program, information on the HOME Program and ESG Program activities are listed below.

1. PY 2025 CDBG Planning and Administrative Costs
2. Rehabilitation of the Emergency Shelter
3. Expansion and Rehabilitation of the Tanapag Youth Center
4. Expansion and Rehabilitation of the Sinapalo Youth Center
5. Rehabilitation of Miguel (Tan Ge’) Pangelinan Field
6. PY 2025 HOME Planning and Administrative Costs
7. Homeowner Investment Partnerships (Homeowner Rehabilitation)
8. Homeowner Investment Partnerships (New Construction)
9. HESG 2025 Commonwealth of the Northern Mariana Islands

#	Project Name
1	PY2025 CDBG Planning and Administrative Costs
2	Rehabilitation of the Emergency Shelter
3	Expansion and Rehabilitation of the Tanapag Youth Center
4	Expansion and rehabilitation of the Sinapalo Youth Center
5	Rehabilitation of Miguel (Tan Ge’) Pangelinan Field
6	PY2025 HOME Planning and Administrative Costs
7	Homeowner Investment Partnership (Homeowner Rehabilitation)
8	Homeowner Investment Partnership (New Construction)
9	HESG 2025 Commonwealth of the Northern Mariana Islands

**Table 5 – 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. In addition, CDBG-DR's allocation priorities are for Housing, Infrastructure and Economic Development. The total amount of funds available for the Northern Mariana Islands is \$243,946,000 of which \$195,157,000 (80 percent) must be utilized in the HUD Most Impacted Areas of Saipan and Tinian. Overall, a minimum of 70 percent of the CDBG-DR funds excluding administrative dollars must benefit the low- and moderate-income populations on the islands.

## AP-38 Project Summary

### Project Summary Information

<b>1</b>	<b>Project Name</b>	PY 2025 CDBG Planning and Administrative Costs
	<b>Target Area</b>	Saipan Tinian Rota
	<b>Goals Supported</b>	Public Facilities and Improvements Promote Fair Housing Community Enhancement
	<b>Needs Addressed</b>	Non Housing Community Development
	<b>Funding</b>	CDBG: \$196,025.00
	<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 47,329 of which about 70 % are low-mod income. Estimated CDBG funding: \$196,025;Eligible activity under 24 CFR570.206(a)(1); National Objective: LMA 24 CFR Part 570.208(a)(1)(i);
	<b>Target Date</b>	9/30/2026
	<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 47,329; CDBG admin funds will maintained at the NMHC Central Office in Garapan, Saipan

	<b>Location Description</b>	CNMI-wide- Saipan, Tinian, and Rota with a population of 47,329; CDBG admin funds will be maintained at the NMHC Central Office in Garapan, Saipan.
	<b>Planned Activities</b>	CDBG Planning and Administrative Costs
2	<b>Project Name</b>	Rehabilitation of the Emergency Shelter
	<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: \$246,095.24
	<b>Description</b>	The Department of Community and Cultural Affairs (DCCA)/ Division of Youth Services (DYS) submitted a proposal for the rehabilitation of the Emergency Shelter located in Capital Hill, Saipan. The project will allow the Division of Youth Services(DYS) provide temporary placement of a child who is places under DYS custody as a result of child abuse and/or neglect and displaced/homeless youth. The programs and services include: providing direct client care and supervision, daily hygiene, preparing and serving meals, homework/tutoring services, school projects, and transportation services to and from appointments. Eligibility citation: Part 570.201(c). The project meets Goal #7: To acquire, construct or rehabilitate public facilities for low-mod income communities and special needs populations. CDBG Funding: \$240,000.00+ estimated PI of \$6,095.24= \$246,095.24; National Objective: LMA 24 CFR Part 570.208(a)(1)(i)
	<b>Target Date</b>	June 2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project will benefit the entire CNMI, as the Division of Youth Services is the mandated state agency to provide social service programs for children, youth and families throughout the CNMI. The project location will be on Saipan, its immediate service area, with a population of 41,927 of which 29,200 or 69% 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>	Capital Hill, Saipan

	<b>Planned Activities</b>	To rehabilitate the existing structures to improve the program services of the DYS Emergency Shelter and most importantly provide a temporary shelter for victims of child abuse and neglect and displaced/homeless youth
<b>3</b>	<b>Project Name</b>	Expansion and 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: \$150,095.24
	<b>Description</b>	The Department of Community and Cultural Affairs (DCCA)/ Division of Youth Services (DYS) submitted a proposal for the Expansion and Rehabilitation of the Tanapag Youth Center located in Tanapag, Saipan. The project will allow the Division of Youth Services (DYS) to provide prevention and supportive activities that would assist youths and families in developing sustainable basic/life skills. The program objective is to eliminate at-risk behaviors and provide opportunities for a more positive lifestyle, enhancing participant capacity and making healthier life choices and achieving self-sufficiency. Eligibility citation: Part 570.201(c). The project meets Goal #7: To acquire, construct or rehabilitate public facilities for low-mod income communities and special needs populations. CDBG Funding: \$144,000.00+ estimated PI of \$6,095.24= \$150,095.24; National Objective: LMA 24 CFR Part 570.208(a)(1)(i)
	<b>Target Date</b>	June 2026
	<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 the village of Sinapalo. Census Tract: 9501, Block group 1-3, with a total population of 1,876, of which 1,303 or 69% are low-mod income.
	<b>Location Description</b>	Sinapalo, Rota
<b>Planned Activities</b>	To rehabilitate the existing structures to improve the program services of the Youth Center	
<b>4</b>	<b>Project Name</b>	Expansion and Rehabilitation of the Sinapalo Youth Center

	<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: \$231,195.24
	<b>Description</b>	The Department of Community and Cultural Affairs (DCCA)/ Division of Youth Services (DYS) submitted a proposal for the Expansion and Rehabilitation of the Tanapag Youth Center located in Tanapag, Saipan. The project will allow the Division of Youth Services (DYS) to provide prevention and supportive activities that would assist youths and families in developing sustainable basic/life skills. The program objective is to eliminate at-risk behaviors and provide opportunities for a more positive lifestyle, enhancing participant capacity and making healthier life choices and achieving self-sufficiency. Eligibility citation: Part 570.201(c). The project meets Goal #7: To acquire, construct or rehabilitate public facilities for low-mod income communities and special needs populations. CDBG Funding: \$225,100.00+ estimated PI of \$6,095.24= \$231,195.24; National Objective: LMA 24 CFR Part 570.208(a)(1)(i)
	<b>Target Date</b>	June 2026
	<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 group 1-2, with a total population of 1,358, of which 938 or 69% are low-mod income.
	<b>Location Description</b>	Tanapag, Saipan
	<b>Planned Activities</b>	To rehabilitate the existing structures to improve the program services of the Youth Center
5	<b>Project Name</b>	Rehabilitation of the Miguel (Tan Ge') Pangelinan Field
	<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: \$181,095.23
	<b>Description</b>	The Department of Community and Cultural Affairs (DCCA) and Northern Marianas Sports Association (NMSA) submitted a proposal for the Rehabilitation of the Miguel (Tan Ge') Pangelinan Field located in the Oleai Sports Complex, Saipan. The field is in need of repair since the damage caused by Super Typhoon Yutu. Minimal cosmetic repairs were made, but did not address the safety concerns needed to make the facility a safe and usable facility. The project will provide continued use for baseball and softball activities, community engagement and development. Once the project is completed, NMSA will be the responsible entity for the operation, maintenance and management of the Oleai Sports Complex. Eligibility citation: Part 570.201(c). The project meets Goal #7: To acquire, construct or rehabilitate public facilities for low-mod income communities and special needs populations. CDBG Funding: \$175,000.00+ estimated PI of \$6,095.23= \$181,095.23; National Objective: LMA 24 CFR Part 570.208(a)(1)(i)
	<b>Target Date</b>	June 2026
	<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 Oleai, Saipan. Census Tract: 2, Block group 1-2, with a total population of 1,358, of which 938 or 69% are low-mod income.
	<b>Location Description</b>	Oleai Sports Complex, Saipan
	<b>Planned Activities</b>	Replacement of spectator seating, tin roof, extension of dugouts, fencing and gate (for spectator stand, outfield, west side of field), and installation of lighting fixtures.
6	<b>Project Name</b>	PY 2025 HOME Planning and Administrative Costs
	<b>Target Area</b>	Saipan Tinian Rota

	<b>Goals Supported</b>	Sustain Affordable Housing Stock Expand Housing Stock Promote Fair Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$61,158.55
	<b>Description</b>	HOME Planning and administrative costs for PY 2025; In the annual goals supported, all goals related to the HOME program were checked, as administrative costs will be incurred in planning for projects related to the HOME goals. HOME admin funded amount:(15% of PY 202 Allocation) \$61,158.55 + \$38,335.34= \$99,493.89 (15% of expected HOME PI)= \$99,493.79; Eligible activity under 24 CFR 92.207(a)(1)
	<b>Target Date</b>	9/30/2026
	<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 (rehab and new construction) that will be assisted through the HOME Program. As such, admin costs will be incurred in planning for HOME projects (approximately 7 households every year).
	<b>Location Description</b>	CNMI wide
	<b>Planned Activities</b>	HOME administrative and planning costs
<b>7</b>	<b>Project Name</b>	Homeowner Investment Partnerships (Homeowner Rehabilitation)
	<b>Target Area</b>	Saipan Tinian Rota
	<b>Goals Supported</b>	Sustain Affordable Housing Stock Promote Fair Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$281,099.86

	<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: \$115,732.15+ \$165,367.71 (50% of PI) = \$281,099.86; Project meets goal #4- To sustain the affordable housing stock
	<b>Target Date</b>	9/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	To assist up to 3 households in Year 2 of the Consolidated Plan. NMHC will determine, depending on funding availability, the number of homes to be constructed or purchased with HOME funds (using PY funding)
	<b>Location Description</b>	CNMI wide
	<b>Planned Activities</b>	Homeowner rehabilitation
8	<b>Project Name</b>	Homeowner Investment Partnerships Program (Homebuyer/New Construction)
	<b>Target Area</b>	Saipan Tinian Rota
	<b>Goals Supported</b>	Expand Housing Stock Promote Fair Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$396,200.01

	<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 (1) units (up to 2 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: \$230,832.30 + \$165,367.71 (50% of PI) = \$396,200.01; Project meets goal #5- To expand the affordable housing stock
	<b>Target Date</b>	9/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	To assist up to 3 households in Year 2 of the Consolidated Plan. NMHC will determine, depending on funding availability, the number of homes to be constructed or purchased with HOME funds (using PY funding)
	<b>Location Description</b>	CNMI wide
	<b>Planned Activities</b>	Homebuyer/New Construction for first time homeowners
9	<b>Project Name</b>	HESG24 Commonwealth of the Northern Mariana Islands
	<b>Target Area</b>	CNMI Wide
	<b>Goals Supported</b>	Community Enhancement Provide Services to the Homeless
	<b>Needs Addressed</b>	Homelessness
	<b>Funding</b>	ESG: \$81,210.00

	<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 and homelessness prevention funds. In order for the households to be assisted, planning and admin costs will be incurred. Allocation breakdown is as follows: \$25,239.75 (housing relocation and stabilization services); \$8,000 (HMIS); Planning and Admin- \$6,090.75 (allocated to NMHC); \$25,127.70 (rapid re-housing assistance) and \$16,751.80 (homelessness prevention assistance). The total allocation breakdown equates to \$81,210 (ESG funded amount). Project meets goal #10- To provide services to the homeless. Eligibility Citation: 24 CFR 576.106,107,108.
	<b>Target Date</b>	09/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	4 households assisted with rapid rehousing funds 2 households assisted with homelessness prevention funds
	<b>Location Description</b>	Assistance will be provided to families who qualify for ESG. With the help of the case manager, the applicant will select a unit (owned by a private landlord). The units will be scattered within Saipan, Tinian, or Rota therefore, there is no particular address where activities will be undertaken. NMHC's main office is located in Garapan, Saipan.
	<b>Planned Activities</b>	To provide rapid rehousing and homelessness prevention services which includes up to 12 months' rental assistance, security and utility deposit, and up to 12 months' utility allowance for households who qualify for the assistance. In addition, funds will be used for the HMIS, planning and admin, and housing relocation and stabilization services
10	<b>Project Name</b>	Alternate Projects (TBD)
	<b>Target Area</b>	
	<b>Goals Supported</b>	

	<b>Needs Addressed</b>	
	<b>Funding</b>	
	<b>Description</b>	
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	



## **AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)**

**Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?**

The CNMI will not apply for a Section 108 Loan at this time.

**Available Grant Amounts**

**Acceptance process of applications**

**AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)**

**Will the state allow units of general local government to carry out community revitalization strategies?**

The CNMI will not be carrying out revitalization strategies.

**State’s Process and Criteria for approving local government revitalization strategies**



## AP-50 Geographic Distribution – 91.320(f)

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

The HOME grant will be allocated to the islands of Saipan, Tinian, and Rota. CDBG, HTF, and HESG will be allocated to the island of Saipan.

#### Geographic Distribution

Target Area	Percentage of Funds
Saipan	75
Tinian	0
Rota	25

Table 6 - Geographic Distribution

#### Rationale for the priorities for allocating investments geographically

The CPD entitlement grants will be allocated to the islands of Saipan, and Tinian. CDBG: Target areas are the islands of Saipan and Tinian, as the CDBG selection committee, based on a criteria, selected (3) projects to be located on the island of Saipan. ESG: ESG assistance is CNMI wide for literally homeless and at risk of homelessness families. 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.

#### Discussion

none

## Affordable Housing

### AP-55 Affordable Housing – 24 CFR 91.320(g)

**Introduction:**

The CNMI proposes to provide rental assistance to approximately 6 households for this Action Plan year through the Emergency Solutions Grant Homeless Prevention and Rapid Re-Housing program.

Additionally, the CNMI proposes to utilize HOME funds to rehabilitate the homes of low-and moderate-income homeowners to bring these units up to building code with energy efficient fixtures or accessibility features as a goal to stabilize or sustain the stock of housing. This Plan year, the CNMI does not anticipate acquiring any existing units to rehabilitate or convert for use of providing affordable housing or community facilities.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	6
Non-Homeless	4
Special-Needs	0
<b>Total</b>	<b>10</b>

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

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	6
The Production of New Units	3
Rehab of Existing Units	1
Acquisition of Existing Units	0
<b>Total</b>	<b>10</b>

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

**Discussion:**

The CNMI proposes to provide rental assistance to approximately 4-6 households for this Action Plan year through the Emergency Solutions Grant Homeless Prevention and Rapid Re-Housing program.

Additionally, the CNMI proposes to utilize HOME funds to rehabilitate the homes of low-and moderate- income homeowners to bring these units up to building code with energy efficient fixtures or accessibility features as a goal to stabilize or sustain the stock of housing. This Plan year, the CNMI does not anticipate acquiring any existing units to rehabilitate or convert for use of providing affordable housing or community facilities.

## **AP-60 Public Housing - 24 CFR 91.320(j)**

### **Introduction:**

NMHC administers the Section 8 HCVP, Multifamily Program, and Emergency Housing Choice Voucher Programs

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

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

- Explore opportunities to leverage funds to create additional housing opportunities;
- Seek additional rental vouchers;
- Increase leasing-up activities;
- Maintain high occupancy rates by decreasing the number of vacant units;
- Continue renovation and modernization efforts for all existing units;
- Increase enforcement efforts;
- Promote Self-Sufficiency and asset development of assisted household;
- Ensure equal opportunity for all persons in need of housing assistance; and

Achieve a HUD “high performer” rating under the Section 8 Management Assessment Program (SEMAP)

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

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

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

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

## **Discussion:**

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 out of these shelters, as mentioned, traditionally, the families of such individuals take them in and provide assistance in any way possible. For those formerly homeless and assisted through the ESG Program, NMHC's case managers ensure that the households (most of whom are special needs households) do not revert back to homelessness by proactively evaluating the families and providing 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 reviving 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-65 Homeless and Other Special Needs Activities – 91.320(h)**

### **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 the near future, and if granted CoC funding, will be implementing a CoC program. Homelessness has been rapidly growing in recent years which prompted the CNMI to shift from funding shelter operations to rapid re-housing and homelessness prevention activities since 2011. Through the PIT count conducted in January 2020, a total of 302 households, comprising 1,307 persons were found to be homeless or at risk of homelessness .

However, there continues to be a significant demand for housing assistance due to the recent disasters that made landfall in 2015 and 2018, sudden loss of jobs, overcrowding in homes, exorbitant costs of utilities, substandard housing, etc. There is no specific program specifically targeting veterans, and currently, there are no transitional or supportive housing programs in the CNMI. The NMHC, through the Section 8 Programs and ESG, is the only agency in the CNMI that provides housing assistance for more than a month's time. There are about 700+ households on the waiting list.

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

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

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

## **Addressing the emergency shelter and transitional housing needs of homeless persons**

As a goal in the next five years, plans to support financing of transitional housing to provide temporary housing for homeless individuals, including those who are transitioning from drug rehabilitation centers and prison and support financing the construction of an emergency shelter to provide temporary housing for those who are seeking shelter from a disaster or who find themselves temporarily homeless. NMHC hopes to build one or both types of projects starting PY 2025. (emergency shelter or transitional housing facilities or both)

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

All the actions above address this section.

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

All the actions above address this section.

## **Discussion**

The CNMI currently does not receive HOPWA funds. To address the above sections pertaining to the subpopulations, NMHC established partnerships with the following agencies: Department of Fire and Emergency Management Services, Department of Public Safety, the judiciary system (Family Court), Karidat Social Services, Office of Vocational Rehabilitation, Council on Developmental Disabilities, Department of Community and Cultural Affairs, and the Community Guidance Center to accomplish the following: address the increasing homeless problem in the CNMI, involvement in the PIT survey, and hopefully, successfully implement a CoC in the CNMI. Currently, the CNMI does not have programs for individuals being discharged from publicly funded institutions and systems of care, as traditionally, the families of such individuals take them in and provide assistance in any way possible. The DYS Shelter provides housing for runaway youth, neglected and abused youth, and youth who are victims of domestic violence (and therefore are homeless due to their situations). The Guma Espersansa Shelter provides housing to women and children who are victims of domestic violence. For the subpopulations transitioning of these shelters, as mentioned, traditionally, the families of such individuals take them in and provide assistance in any way possible. For those formerly homeless and assisted through the ESG Program, NMHC's case managers ensure that the households (most of whom are special needs households) do not revert back to homelessness by proactively evaluating the families and providing 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 – 91.320(i)**

### **Introduction:**

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

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

#### Minimum Wage & Employment

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

#### Construction Costs

A significant barrier to producing more affordable housing is the rising cost of development and the limited foreign labor capacity in the CNMI. The CNMI being geographically located in typhoon alley calls for stringent building codes to withstand severe weather, with winds above 200 MPH as demonstrated by Super Typhoon Yutu. Labor costs have directly impacted the cost of construction: The provisions of US Public Law 110-229 which phases out the CNMI's non-resident labor pool, commonly referred to as a "Commonwealth Worker" or "CW", have created an unprecedented labor quandary which has negatively impacted the CNMI's private sector. Coupled with this mandated reduction of foreign sourced labor is a significantly small populace resulting from our migration prompted by the jurisdiction's previous economic downturn. ~~According to the 2010 CNMI Census, the CNMI's population declined nearly 22% from the previous decade,~~ **According to the 2020 CNMI Census, the CNMI's population declined nearly 12% from the previous decade, which** further shrank the available labor pool required to support a recovering economy. According to the Government Accountability Office's (GAO) report, the elimination of the CNMI's non-resident labor pool would result in a maximum 62% decrease in Gross Domestic Product (GDP). The CNMI, through its US Delegate to Washington DC, the construction industry in the CNMI, and businesses continue to advocate for restoration of H2-B Visa Waivers for construction workers and to increase the cap on the number of contract workers (particularly in the construction industry) from the Philippines and China.

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

**Discussion:**

none

## **AP-85 Other Actions – 91.320(j)**

### **Introduction:**

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

### **Actions planned to address obstacles to meeting underserved needs**

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

### **Actions planned to foster and maintain affordable housing**

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

### **Actions planned to reduce lead-based paint hazards**

EPA/HUD/Consumer Project Safety Commission lead hazard information pamphlet, or an Reapproved equivalent<sup>1</sup> 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.

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

2. 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**

Collaborate with the Department of Labor, the Community Development Institute of the Northern Marianas College, the Northern Marianas Technical 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.

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

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. 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.

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**

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

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

In addition, one of the goals mentioned above in developing institutional structure is for the NMHC to continuously work with the Administration and the Mayors of Saipan, Tinian, and Rota to identify community planning and development and housing needs. One of the housing unmet needs is the availability of affordable, rental housing units in the CNMI. Due to the devastation of Super Typhoon Yutu in October 2018 and the significant number of families whose homes were destroyed and most of those families seeking rental units, it has been a challenge to identify available and affordable rental units in the CNMI for the past year. Because of this, NMHC has worked collaboratively with government and

non-profit agencies, took the lead in the Housing Task Force and continues to work with other agencies to ensure that unmet housing needs are met. The CNMI continues to be committed to enhancing and improving the institutional structure supporting the administration of the CNMI's Annual Action Plan.

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

The NMHC continues to coordinate with various social service providers such as Karidat Social Services, Department of Labor • Workforce Investment Agency, Northern Marianas College's 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 implemented the Family Self-Sufficiency Program which links HCVP tenants to various community programs. The NMHC 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:**

none

## **Program Specific Requirements**

### **AP-90 Program Specific Requirements – 91.320(k)(1,2,3)**

#### **Introduction:**

#### **HOME Investment Partnership Program (HOME) Reference 24 CFR 91.320(k)(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. The maximum assistance amount cannot exceed the HUD HOME maximum per-unit subsidy limit. For a Homeowner rehab activity, NMHC will assess the house and the proposed rehab to determine that when completed the after-rehab value of the house will not exceed the HOME 95% value limits for the CNMI as published by HUD; the home value limits, or 95% of the median area purchase price is also applicable for HOME Homebuyer activities. NMHC will examine the sources and uses of funds for the project and determine that the costs are reasonable and that NMHC is not investing any more HOME funds, alone or in combination with other governmental assistance, than is necessary.

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

The latest update and amendments to the HOME policies and procedures ensures the deletion of the Resale provisions and leaves the Recapture as the main form to be used moving forward. An excerpt from the HOME Homebuyer policies and procedures on recapture:

§ 100-100.1-315

(a) Recapture. NMHC will ensure that it recoups all or a portion of the HOME loan assistance provided to the homebuyer(s), if the housing unit ceases to be the principal residence of the homebuyer(s) for the duration of the period of affordability. 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) fewer closing costs.

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:

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

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

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

Additional Narrative: The CNMI gives preferences to a segment of the low-income population by categorizing them into target groups as first priority, second priority, third priority, and fourth priority. For instance, for the Homeowner Rehab, the classification of such groups are as follows:

1. First Priority: Elderly or disabled families with income between 0%- 30% of the area median income. This target group is eligible for grant assistance. Elderly or disabled household applicants may receive 100% grant assistance. A combination of non-interest loan and grant assistance may be provided to very low-income non-elderly or non-disabled applicants whose income falls between 0%-20% provided that the first half of the assistance will be in the form of a non-interest-bearing loan and the next half will be in the form of a grant.

2. Second Priority: Very low-income families with limited financial resources whose income fall between 20.1%-30% of the HUD income limits; a fixed rate of one percent shall apply throughout the term of the loan.
3. Third Priority: Low-income families with limited financial resources whose income fall between 30.1%-50% of the HUD income limits; a fixed rate of two percent shall apply throughout the term of the loan.
4. Fourth Priority: Low-income families with limited financial resources whose income fall between 50.1% to 80.0% of the HUD income limits; a fixed rate of three percent shall apply throughout the term of the loan.

See Appendix D- HOME Policies and Procedures

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

n/a

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

n/a

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

n/a

**Emergency Solutions Grant (ESG)  
Reference 91.320(k)(3)**

1. Include written standards for providing ESG assistance (may include as attachment)
  - See Appendix E: Written Standards for HESG
  
2. If the Continuum of Care has established a centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.
  - The CNMI CoC was established in May 2016; however, the CNMI does not have a centralized or coordinated assessment system. All referrals for housing assistance from other organizations are transmitted to NMHC for assistance.
  
3. Identify the process for making sub-awards and describe how the ESG allocation is 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 (8) members ((3) of which are Board of Directors from each jurisdiction) select a proposal based on the following:

- The applicant's history of providing effective shelter or prevention services to the homeless, and of successfully operating performance-based grant-funded programs
- The applicant's effective coordination with organizations in their local "continuum of care", to address identified gaps in services for the homeless and improve outcomes for participants
- The applicant's ability to transition street or unsheltered homeless participants or shelter residents to permanent housing, and/or prevent homelessness for families and individuals who are at risk of homelessness.
- 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 ESG. The following factors are considered in selecting a homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services under ESG:

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

Describe performance standards for evaluating ESG.

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

**Housing Trust Fund (HTF)**  
**Reference 24 CFR 91.320(k)(5)**

1. How will the grantee distribute its HTF funds? Select all that apply:

Applications submitted by eligible recipients

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state

agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".

n/a

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

1. Non-profit or for-profit organizatio
2. Has the capacity and experience to administer the program

b. Describe the grantee's application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

N/A

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

N/A

d. Describe the grantee's required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

N/A

e. Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

N/A

f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

N/A.

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

N/A

h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

N/A

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

N/A

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

N/A

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

N/A

**6. Performance Goals and Benchmarks.** The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

N/A

**7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds.** Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

N/A

**8. Rehabilitation Standards.** The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; Capital Needs Assessments (if applicable); and broadband infrastructure (if applicable).

N/A

**9. Resale or Recapture Guidelines.** Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

n/a

**10. HTF Affordable Homeownership Limits.** If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

N/A

**12. Refinancing of Existing Debt.** Enter or attach the grantee's refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter "N/A."

n/a

**Discussion:**

The CNMI will not administer PY 2025 HTF Fund