

DRAFT Program Year 2019 (FY 2020) Consolidated Annual Performance Report

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The CNMI's PY 2019 projects addressed several goals such as:

- Public Facilities and Improvement
- Special Needs and Low-mod income housing
- Increase homeowner education and counseling
- Sustain affordable housing stock

The PY 2019 projects included (CAPER for PY 2018 states that these projects were postponed from PY 2018 to PY 2019 to address disaster-related projects.): Rehabilitation of the Tinian Gymnasium Basketball Court, Rehabilitation of the Tanapag Youth Center, Rehabilitation of the Sinaplo Youth Center, and the Rehabilitation of the Sinapalo Children's Park Roof, Homeowner Rehabilitation, Homeownership Assistance, Rapid Re-housing Assistance . CDBG projects were initialized but no projects were completed within PY2019. Of the PY 2019 projects selected, 80% of CDBG funds was committed to Public Facilities and Improvement projects and 20% of the funds was committed to Planning and Administrative costs. Planning and Admin costs involve addressing the prerequisite requirements for project and monitoring such projects for regulatory compliance, processing of payment requests, and implementation of proposed priorities and goals established in the Consolidated Plan. HOME-Homeowner Rehabilitation Program which meets two goals: 1) Sustain affordable housing stock 2) Special Needs and low-mod income housing, NMHC did not close on any loans for the period. This was mainly due to the pending implementation of the amended HOME Policies and Procedures; as well as, the COVID-19 pandemic constraints that delayed the processing of new and existing household applicants. Through the HESG Program, the goal of special needs and low-mod income housing was met, particularly addressing the homelessness priority need. The NMHC's goal was to assist up to (6) households with rapid re-housing assistance. A total of (14) households , comprised of (67) persons, were assisted in PY 2019 (The number is based on households assisted with PY 2018 and PY 2019 funds IN PY 2019; Intake was conducted in PY 2019). A total of (14) households were assisted with rapid re-housing assistance. In addition, through the ESG-COVID Program, NMHC served a total of (11) households, comprised of (35) persons, with homelesnsness prevention assistance, and a total of (14) households, comprised of (47) with rapid rehousing assistance.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and

explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

(Pending)

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

As we had stated in the Executive Summary above, projects originally selected for PY 2018 funding were postponed until PY 2019. See below for details on the project, which address the need of public facilities and improvements in the CNMI.

Rehabilitation of the Tinian Gymnasium Basketball Court- The Office of the Mayor of Tinian submitted a proposal for the project. The Tinian Gym Basketball Court is the only indoor gym facility where the community of Tinian can play sports and is one of the most used facilities on the island. The project is considered a “public facility” and is eligible under 24 CFR Part 570.201(c) . CDBG Funded Amount: \$86,250. As of PY 2019, the project has not started.

Rehabilitation of the Tanapag Youth Center - The CNMI Department of Community and Cultural Affairs submitted a proposal for the project. The Tanapag Youth Center is open to youth and children alike for recreational activities, events, and a place where they can gather. The TYC is also used for town hall meetings, outreach activities, and recreational activities for residents who reside on the island of Tinian. The project is considered a “public facility” and is eligible under 24 CFR Part 570.201(c) . CDBG Funded Amount: \$200,000. As of PY 2019, the project has not started; however, the NTP was issued in PY 2020.

Rehabilitation of the Sinaplo Youth Center- The CNMI Department of Community and Cultural Affairs submitted a proposal for the project. The SYC is open to youth and children alike for recreational activities, events, and a place where they can gather. The SYC is also used for town hall meetings, outreach activities, and recreational activities for residents who reside on the island of Rota. The project is considered a “public facility” and is eligible under 24 CFR Part 570.201(c) . CDBG Funded Amount: \$200,000. As of PY 2019, the project has not started; however, the

NTP was issued in PY 2020.

Rehabilitation of the Sinapalo Children’s Park Roof- The Office of Grants Management submitted a proposal for the project. The SCP is open to youth and children alike for recreational activities, events, and a place where they can gather. The SYP is also used for town hall meetings, outreach activities, and recreational activities for residents who reside on the island of Rota. The project is considered a “public facility” and is eligible under 24 CFR Part 570.201(c) . CDBG Funded Amount: \$284,910.80. As of PY 2019, the project has not started.

The above CDBG projects, with the exception of the Tanapag Youth Center(being that it was the project most ready to proceed) were delayed because of the potential plans of reprogramming the PY 2019 funds (same projects reprogrammed in PY 2018) to the Purchase of Modular Homes for Transitional Housing since it’s been a priority need for the CNMI, especially as a result of the devastation on the CNMI’s housing infrastructure caused by Super Typhoon Yutu. It would have been NMHC’s second attempt to bid the purchase of the modular homes project; however, the grant amount was insufficient to cover the bid price that was submitted at that time. Therefore, as of September 2020, NMHC will continue to support the funding of the original projects and will move expeditiously to proceed with them.

Homeowner Rehabilitation Program- The goal was to assist (2) households per year- which also supports the goals of sustaining affordable housing stock and special needs and low-mod income housing. The project addresses the need for affordable housing in the CNMI. Homeowners were able to rehabilitate their homes to local building code standards and/or modify to meet ADA standards. NMHC was unable to complete any rehabilitation of homes in PY 2019.

HOME Direct Homeownership Assistance- The goal was to assist (3) households per year for new construction and (1) household for the acquisition of a home-which also supports the goal of special needs and low mod income housing and increasing homeownership counseling and education. The project addresses the need for affordable housing in the CNMI. NMHC closed on (0) loans and completed (0) homes for first time, qualified homeowners for the period

HESG: In the reporting year, the CNMI utilized HESG funds for rapid re-housing and homelessness prevention activities- to provide financial assistance (up to ten months) such as rental assistance, utility deposit and utility allowance, and rental arrears, to extremely low income households who are literally homeless. Funds were also used for case management and the provision of housing search and placement. The goal was to utilize HESG fund to assist up to (6) households per year. A total of (14) households were assisted in PY 2019, of which there were (6) new households (intake was completed and households were deemed eligible within the program year).

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

Narrative

No homes were completed and no loans were closed during the program year. However, the Mortgage Division was able to approve a total of (20) loans within the program year. The figures for the ESG program are based on the numbers of households assisted with PY 2018 and PY 2019 HESG Allocation. All households assisted through the regular ESG program and the ESG-COVID programs were of Native Hawaiian/Pacific Islander race and non-hispanic. There were no CDBG projects completed in PY 2019. PY 2019-funded projects are currently ongoing and is expected to be completed within PY 2020.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,513,221	1,374,289.76
HOME	public - federal	429,574	35,906.05
ESG	public - federal	352,760	82,432.13

Table s - Resources Made Available

Narrative

CDBG

In this table, NMHC inputted resources made available for the regular CDBG and CDBG-COVID programs. The CNMI receives an allocation of approximately \$960K annually and within PY 2019, the CDBG-COVID first and second allocation grant agreements were executed; however, only the CDBG-COVID first allocation was received during the program year. The total amount of the CDBG-COVID first allocation is \$549,270. The sum of the PY 2019 CDBG allocation and the CDBG-COVID first allocation is reflected in the table above. This reporting year, the CNMI spent a total of \$1,374,289.76 in CDBG funds. Note that drawdowns were made from prior years' and PY 2019 CDBG allocations, and no draws were made from CDBG-COVID first allocation within the program year.

ESG

The CNMI continues to utilize its ESG funds for rapid re-housing services. 100% of the funds draws were used towards rapid re-housing services which includes housing relocation and stabilization services and financial assistance. As homelessness is an increasing problem in the CNMI, the CNMI focuses on assisting literally homeless families and individuals to move into a decent home, and through NMHC, work with the ESG-assisted households to sustain their housing status and improve their lives. In this table, NMHC inputted resources made available for the regular CDBG and CDBG-COVID programs. The CNMI receives an allocation of approximately \$77K annually and within PY 2019, the ESG-COVID first and second allocation grant agreements were executed; however, only the ESG-COVID first allocation was received during the program year. The total amount of the ESG-COVID first allocation is \$275,414. The sum of the PY 2019 ESG allocation and the ESG-COVID first allocation is reflected in the table above. This reporting year, the CNMI spent a total of \$82,432.13 regular G funds. Note that drawdowns were made from prior years' and PY 2019 allocations, and no draws were made from ESG-COVID first allocation within the program year.

HOME

This reporting year, the CNMI serviced a total of twenty (20) household applicants, of whom twelve (12) households were approved and afforded the opportunity of first-time homeownership; but zero (0) HOME loans were closed during the PY. The CNMI received a HOME allocation amount of \$429,574 in PY 2019. A total amount of \$35,906.05 PI was spent within the program year for planning and administrative costs.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Rota	No planned percentage	63	U.S. Territory
Saipan	No planned percentage	26	U.S. Territory
Tinian	No planned percentage	11	U.S. Territory

Table 2 – Identify the geographic distribution and location of investments

Narrative

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. In PY 2019, a total of (4) projects were selected by the CDBG selection committee are located on the islands of Saipan (1 project), Rota (2 projects) and Tinian (1 project). 20% or \$192,790 was allocated for planning and administrative expenses, and 80% or \$771,161 was allocated for projects .

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

The CNMI is waived from any HOME, ESG, or CDBG matching requirements.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	0
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	0
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	0

Table 3 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
0	0	0	0	0	0	0	0	0

Table 4 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
723,247	235,051.34	35,906.05	0	922,492.29

Table 5 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	0	0	0	0	0	0
Number	5	0	5	0	0	0
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	0	0	0			
Number	5	0	5			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

Table 6 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 7 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition		
Parcels Acquired	0	0
Businesses Displaced	0	0
Nonprofit Organizations Displaced	0	0

Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 8 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	6	39
Number of Non-Homeless households to be provided affordable housing units	8	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	14	39

Table 9 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	6	25
Number of households supported through The Production of New Units	4	0
Number of households supported through Rehab of Existing Units	2	0
Number of households supported through Acquisition of Existing Units	2	0
Total	14	25

Table 10 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

In the HOME program, the goal was to provide direct homeownership assistance to up to (3) households for the construction of a new home (1) household for the acquisition of an existing home. NMHC did not meet its projected goal (specifically the goal of a HOME-eligible household to acquire an existing home) due mainly to constraints in household qualifications and certain income limit eligibility, as well as certain necessary updates to the environmental review procedures and this causing delays in being able to move the projects forward. Aside from these factors, the COVID 19 pandemic also caused delays in the processes. Nonetheless, there is still a demand for the HOME Program as indicative of the (20) loans approved within the program year.

Discuss how these outcomes will impact future annual action plans.

Continual demand for the HOME Program as well as the need to increase the housing stock in the CNMI would leave to positive outcomes in the future of the housing market. This would require the CNMI to reassess its priorities and goals to accurately reflect a workable action plan.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Table 11 – Number of Households Served

Narrative Information

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

The NMHC continued the administration of the ESG programs and conducts case management for literally homeless and at risk of homelessness households. The NMHC also: Supported the work of non-profit organizations and the public sector providing assistance to very low and low-income individuals and special needs populations; Supported 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 Center for Living Independently who offer life skill training to a special needs population; NMHC conducted a point-in-time survey in January 2020) and submitted a CoC grant application in September 2020. NMHC received a COC Technical Planning Grant thereafter but was disapproved for the COC (project) grant.

Addressing the emergency shelter and transitional housing needs of homeless persons

As mentioned above, the NMHC continues to support the programs of the Transitional Living center who offer services to those who are likely to become homeless after being discharged from a publicly funded institution. Although HESG funds are not allocated to the only two shelters on island, Division of Youth Services (DYS) Shelter and the Guma Esperansa Shelter (Domestic Violence Shelter) that serve specific populations, NMHC continues to work with the shelters by consulting with the specific entities that operate the shelter on the HESG policies and procedures and such entities were also part of the planning group for the PIT count conducted in October 2018 and the Continuum of Care. NMHC hopes that in the near future, the CNMI is able to build and operate a homeless shelter.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The NMHC continued the implementation of HESG funding by directly administering the program. NMHC conducts case management for literally homeless and at risk of homelessness households. The NMHC also: Supported the work of non-profit organizations and the public sector providing assistance to very low and low-income individuals and special needs populations; Supported 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 Center for Living Independently who offer life skill training to a special needs population; NMHC conducted a point-in-time survey in January 2020) and submitted a CoC grant application in September 2020. NMHC received a COC Technical Planning Grant thereafter but was disapproved for the COC (project) grant.

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

The NMHC continued the implementation of HESG funding by directly administering the program. NMHC conducts case management for literally homeless and at risk of homelessness households. The NMHC also: Supported the work of non-profit organizations and the public sector providing assistance to very low and low -income individuals and special needs populations; Supported 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 Center for Living Independently who offer life skill training to a special needs population; NMHC conducted a point-in-time survey in January 2020) and submitted a CoC grant application in September 2020. NMHC received a COC Technical Planning Grant thereafter but was disapproved for the COC (project) grant.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of 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)

The CNMI continues to administer the Family Self-Sufficiency Program. No households were newly enrolled within PY 2019. However, to date, a total of (31) households are in the FSS Program and are tenants under the Section 8 Multi-Family Program. The FSS Program coordinator is currently working with the households to gain certain skills, secure employment, and earn (or increase) wages. The CNMI also has strengthened its education on fair housing choice to landlords and tenants. A Fair Housing Choice briefing is held for the new Section 8 Voucher recipients.

Actions taken 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.

Actions taken to provide assistance to troubled PHAs

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

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

Minimum Wage

NMHC has no control over the minimum wage. Despite the low minimum wage, NMHC will continue assisting clients based on their eligibility to avail of the programs.

Limited Funding for Housing Programs

The NMHC is committed in ensuring that the needs of the low, very low, and extremely low income household are being addressed. NMHC has implemented the Family Self Sufficiency (FSS) program to work with various organizations in the community to assist clients in obtaining sustainable housing and employment. With the implementation of the FSS program, NMHC is hoping that the number of households on the waiting will be reduced. In PY 2019, no households were newly enrolled in the FSS Program; however, a total of 31 households were assisted and enrolled since the first year of the Consolidated Plan (2015).

The Mortgage and Credit Division (MCD) is committed in providing affordable loans to clients who are first time homeowners, clients who are physically challenged, and assisting clients with rehabilitation of their homes.

The Emergency Solutions Grant (ESG) program in the past program year continued to serve people who are literally homeless and are at risk of being homeless. Due to limited funding from the grantor agency we are able to assist a small number of families. Despite the limited funding, NMHC and Karidat will continue to address and find solutions for the families who are literally homeless and are at risk. NMHC in collaboration with Karidat social services will monitor and conduct quarterly evaluation to clients who have joined the program and assist the clients in continued housing stability after the program. In PY 2019, a total of (39) households, comprised of (149) individuals, were assisted in the regular ESG and ESG-COVID.

Challenges Faced by Persons with Disabilities

NMHC will continue assisting persons with disability in a manner that will be consistent with NMHC and HUD policies and procedures. Persons with disability are required to inform their case worker of their conditions in order for NMHC to conduct home visitation for those who have no transportation or bed-ridden.

NMHC has been exploring avenues in providing application for persons that are visually impaired. NMHC has been vigilant in explaining to clients the program requirements and procedures.

NMHC is currently working on reducing the waiting list for the Section 8 programs. As of date, there are 500+ households on the waiting list. Clients are required to update their status with the housing specialist

from time to time to ensure that accommodations to persons with disabilities are accommodated in a timely and efficient manner. NMHC has been committed to ensuring that persons with disabilities are accommodated.

NMHC has also been enforcing the Fair Housing Act of 1998 since its inception. If for any reason a client feels that the Fair Housing Act of 1998 is not enforced we recommend that they report the matter to their respective NMHC Office or send their complaints to the Corporate Director. In September 2016, the first ever Fair Housing Choice Training was provided by HUD to NMHC's Board of Directors and staff.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

Based on our discussions with various entities, the underserved population are people with disabilities. In the PY 2019 Annual Action Plan, NMHC's goal was to collaborate with the Center for Living Independently who offer life skills training to the disabled population, most of which NMHC serves through the HOME loan and Section 8 Program and are at poverty level. NMHC is currently in discussion with the Council on Developmental Disabilities and Voices of the CNMI, a non-profit organization which serves people with disabilities, on what their current needs are. Both entities have shown interest in building and implementing the Center for Living Independently on the islands of Tinian and Rota. They plan to apply for CDBG funds. There is also currently a movement in the CNMI to ensure all facilities are accessible to people with disabilities.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

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

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

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

- 1) *Notification: Lead Hazard Information Pamphlet- occupants, owners, and purchasers must receive the EPA/HUD/Consumer Project Safety Commission lead-hazard information pamphlet, or an EPA-approved equivalent; Disclosure- property owners must provide purchasers and lessees with available information or knowledge regarding the presence of lead-based paint and lead-based paint hazards prior to selling or leasing a residence; Notice of Lead Hazard Evaluation or Presumption- occupants, owners, and purchasers must be notified of the results of any lead hazard evaluation work or the presumption of lead-based paint or lead hazards.*
- 2) *Notice of Lead Hazard Reduction Activity- Occupants, owners, and purchasers must be notified of results of any lead-hazard reduction work.*
- 3) *Lead Hazard Reduction- Reduction methods described include paint stabilization, interim controls, standard treatments, and abatement.*

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

1. NMHC Collaborated with the Department of Labor, the Community Development Institute of the Northern Marianas College, the Northern Marianas Trades Institute who offer education and employment training to develop plans that will assist families who live below poverty level, most of which NMHC serves through the Section 8 Program. NMHC maintains follow-ups and evaluations with (31) households through the FSS Program in the past year by referral to the aforementioned agencies to gain education and/or employment.
2. In the PY 2019 Annual Action Plan, NMHC's goal was to collaborate with the Center for Living Independently in the CNMI (CLI) who offer life skills training to the disabled population, most of which NMHC serves through the HOME loan and Section 8 Program and are at poverty level. NMHC is currently in discussion with the Council on Developmental Disabilities and Voices of the CNMI, a non-profit organization which serves people with disabilities, on what their current needs are. Both entities have shown interest in building and implementing the CLI on the islands of Tinian and Rota. They plan to apply for CDBG funds. The CLI will receive CDBG-COVID funds in PY 20.
3. In the PY 2019 Annual Action Plan, NMHC's goal was to collaborate with the Department of Community and Cultural Affairs (DCCA) FSS Program to enroll up to (5) families who are currently in the Section 8 FSS Program into the Leadership and Economic Opportunity for Self-Sufficiency Program to obtain on the job training. NMHC did not enroll new families within PY 2019, but currently have (31) families in the program, meeting the ultimate goal of the FSS program as of PY 2019.
4. The NMHC continued the Emergency Solutions Grant Program and assisted up (14) families (total of 67 individuals) with temporary financial assistance. The Subgrantee offered information on specific resources for employment, training, and education and offer guidance on certain matters such as budgeting, energy conservation in the home, etc. NMHC also implemented the ESG-COVID program, wherein a total of (25) households, comprised of (82) persons were assisted.
5. NMHC worked proactively with the current Section 8 households and assisted (31) 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 taken to develop institutional structure. 91.220(k); 91.320(j)

The CNMI continues to be committed to enhancing and improving the institutional structure supporting the administration of the CNMI's Annual Action Plan. Frequent assessment of policies and practices conducted by NMHC's management and Board of Directors are performed to improve processes in the programs. In addition, management of CPD funded Subrecipients are performed to ensure that the activities of the ConPlan through each Annual Action Plan year is carried out accordingly and remains compliant with HUD regulations. In the past year, the actions taken for institutional strengthening included:

- Proactive involvement in various government and non-profit committees (such as the Developmental Disability Council, Headstart Committee, Housing Task Force, Committee to Address Homelessness in the CNMI etc.) to enhance social services to clients (inclusive of NMHC's clients)
- Worked with the Governor, Lt. Governor, Legislature, and the Mayors of Saipan, Tinian, and Rota to identify community planning and development needs
- Worked 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 actions taken above in developing institutional structure is NMHC 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 and FEMA, within PY 2019, to address unmet needs. The CNMI continues to be committed to enhancing and improving the institutional structure supporting the administration of the CNMI's Annual Action Plan.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

Actions taken in the last program year included:

- 1) Enhanced coordination with the Rotary Club and Chamber of Commerce to identify CNMI businesses who are willing to take part in various social service programs administered by local and non-profit agencies and have them assist in terms of funding the programs, more specifically programs that will provide training and education for individuals who choose to start up a small business.
- 2) Enhanced coordination with the Commonwealth Development Authority and provide resources to

individuals who wish to borrow a micro-loan to start a small business. In the past year, there was no official meeting with CDA regarding micro-loans.

3) Through the FSS Program, as of the end of PY 2019, a total of (31) households were enrolled in the program and were provided the resources that will enable them to gain employment (whether it's through businesses directly or the Workforce Investment Agency Program), since the economy is expected to boost in the next few years with the growing hotel and gaming industries.

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

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

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

CR-40 - Monitoring 91.220 and 91.230

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

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The CNMI is required by the U.S. Department of Housing and Urban Development (HUD) to have a detailed Citizen Participation Plan which incorporates the island's policies and procedures for public involvement in the Consolidated/Action Plan process and the CAPER, and the use of Community Development Block Grant (CDBG), HOME Investment Partnerships Grant (HOME), and Emergency Solutions Grant (ESG) funds. The CNMI's Citizen Participation Plan is made available to the public. Additionally, regulation requires that this plan both provide for and encourage public participation, emphasizing involvement by low-and moderate-income people, especially those living in low-and moderate-income neighborhoods. According to the CNMI's Citizen Participation Plan, the Consolidated Annual Performance Reports will be made available for a total of 15 days for the public to provide comment. Update on Waiver: The CNMI availed of the Waiver granted by HUD which allows states and territories to amend their Citizen Participation Plan. NMHC provided no less than (5) days for public comments on the CAPER. Waiver citation: 24 CFR 91.105(C)(2) and (k), 24 CFR 91.115 (c) (2) and (i) and 24 CFR 91.401

See Appendix A: Public Notice for the Review of the CAPER, published on February 24, 2021. The comment period for their review of the CAPER ends on March 2, 2021. The Notice is also available on NMHC's website at www.nmhcgov.net.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The CNMI did not change CDBG program objectives in PY 2019

. All selected and approved CDBG projects are underway.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Not applicable for the CNMI as HOME funds were not used for the implementation of rental housing for the reporting period. All HOME-assisted construction and homeowner rehabilitation projects are required to be inspected by the Asset Manager and a Department of Public Works inspector.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

The equal housing opportunity logo or the “NMHC is an equal employment and fair housing public agency” slogan appears in all paper of general circulation advertisements, brochures, and letterheads. When soliciting for contractors, NMHC provides language in the request for qualifications (published in the local paper) that minority and women owned businesses are encouraged to participate and be a part of NMHC’s List of Approved Contractors. Also, NMHC provides language in the bid announcements that the project is subject to Section 3 of the Housing and Community Development Act of 1968 which requires recipients of HUD funds and the contractors to help ensure that the economic opportunities generated by the HUD funds are provided to local low-income residents and the business that server them “to the maximum extent feasible”. In addition to the language included in the newspapers, the Asset Division Manager, along with the Procurement Officer, hold pre-bid and pre-construction conferences with all interested proponents (pre-bid conference) and the selected contractor (pre-construction conference) and discuss the Section 3 requirements. All inquiries regarding Section 3 requirements are addressed at these conferences.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

See attached IDIS reports

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

To make housing more affordable for families who are of very low income, NMHC has assisted several families through its deferred/direct loan HOME program. Most senior citizens whose only income may be Social Security or minimal retirement pensions have availed of a 100% deferred loan thru this program. Other families with minimal monthly income area also afforded a combination of deferred and direct loan based on their repayment abilities. Other programs such as the Rural Development 504 Rehabilitation program have also played a significant role in NMHC’s assisting its very-low income clientele. In PY 2019, no homes were constructed or rehabilitated in the HOME Program. As mentioned in the Executive Summary, this was mainly due to the pending implementation of the amended HOME

Policies and Procedures; as well as, the COVID-19 pandemic constraints that delayed the processing of new and existing household applicants. As with the ESG Program, NMHC performed a thorough review of each client file (i.e. ability to pay based on income) and have inspected the housing units to ensure that habitability standards are adhered to, have advised ESG tenants to select a unit that they will be able to afford after they have availed of the 10-month (maximum allowance) for the ESG program. NMHC strongly enforced the importance of seeking employment, budgeting finances, availing of other available resources, in hopes that the tenant continues to maintain affordable housing and also achieve self-sufficiency. A total of (14) households were assisted in the regular ESG program and a total of (25) households were assisted in the ESG-COVID program .

CR-56 - HTF 91.520(h)

Describe the extent to which the grantee complied with its approved HTF allocation plan and the requirements of 24 CFR part 93. – The CNMI does not administer the HTF Program.

Tenure Type	0 – 30% AMI	0% of 30+ to poverty line (when poverty line is higher than 30% AMI)	% of the higher of 30+ AMI or poverty line to 50% AMI	Total Occupied Units	Units Completed, Not Occupied	Total Completed Units
Tenure Type:						
Rental						
Homebuyer						

Table 15 - CR-56 HTF Units in HTF activities completed during the period

CR-60 - ESG 91.520(g) (ESG Recipients only)

**ESG Supplement to the CAPER in *e-snaps*
For Paperwork Reduction Act**

1. Recipient Information—All Recipients Complete

Basic Grant Information

Recipient Name NORTHERN MARIANA ISLANDS
Organizational DUNS Number 854856277
EIN/TIN Number 986019463
Identify the Field Office HONOLULU
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance

ESG Contact Name

Prefix Ms
First Name Zenie
Middle Name P
Last Name Mafnas
Suffix 0
Title Deputy Director

ESG Contact Address

Street Address 1 P.O. Box 500514
Street Address 2 0

CAPER

City	Saipan
State	MP
ZIP Code	-
Phone Number	6702346866
Extension	0
Fax Number	0
Email Address	deputydirector@nmhcgov.net

ESG Secondary Contact

Prefix
First Name
Last Name
Suffix
Title
Phone Number
Extension
Email Address

2. Reporting Period—All Recipients Complete

Program Year Start Date	10/01/2019
Program Year End Date	09/30/2020

3a. Subrecipient Form – Complete one form for each subrecipient

Subrecipient or Contractor Name
City
State
Zip Code
DUNS Number
Is subrecipient a victim services provider
Subrecipient Organization Type
ESG Subgrant or Contract Award Amount

CR-65 - Persons Assisted

4. Persons Served

4a. Complete for Homelessness Prevention Activities

Number of Persons in Households	Total
Adults	19
Children	16
Don't Know/Refused/Other	0
Missing Information	0
Total	35

Table 16 – Household Information for Homeless Prevention Activities

4b. Complete for Rapid Re-Housing Activities

Number of Persons in Households	Total
Adults	63
Children	51
Don't Know/Refused/Other	0
Missing Information	0
Total	114

Table 17 – Household Information for Rapid Re-Housing Activities

4c. Complete for Shelter

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 18 – Shelter Information

4d. Street Outreach

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 19 – Household Information for Street Outreach

4e. Totals for all Persons Served with ESG

Number of Persons in Households	Total
Adults	82
Children	67
Don't Know/Refused/Other	0
Missing Information	0
Total	149

Table 20 – Household Information for Persons Served with ESG

5. Gender—Complete for All Activities

	Total
Male	75
Female	74
Transgender	0
Don't Know/Refused/Other	0
Missing Information	0
Total	149

Table 21 – Gender Information

6. Age—Complete for All Activities

	Total
Under 18	67
18-24	19
25 and over	63
Don't Know/Refused/Other	0
Missing Information	0
Total	149

Table 22 – Age Information

7. Special Populations Served—Complete for All Activities

Number of Persons in Households

Subpopulation	Total	Total Persons Served – Prevention	Total Persons Served – RRH	Total Persons Served in Emergency Shelters
Veterans	0	0	0	0
Victims of Domestic Violence	0	0	0	0
Elderly	1	0	1	0
HIV/AIDS	0	0	0	0
Chronically Homeless	5	0	5	0
Persons with Disabilities:				
Severely Mentally Ill	0	0	0	0
Chronic Substance Abuse	0	0	0	0
Other Disability	6	4	2	0
Total (Unduplicated if possible)	12	4	3	0

Table 23 – Special Population Served

CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

10. Shelter Utilization

Number of New Units - Rehabbed	0
Number of New Units - Conversion	0
Total Number of bed-nights available	0
Total Number of bed-nights provided	0
Capacity Utilization	0.00%

Table 24 – Shelter Capacity

11. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

The CNMI currently does not have a CoC in place. In consultation with the various social provider agencies, it was unanimously agreed that HESG funds will be used for homelessness prevention and rapid re-housing assistance, of which the number of households (with a total number of individuals in those households) are reflected in other sections of the ESG sections of this CAPER. In the past program year, a total of (14) households comprised of (67) persons were assisted in the regular ESG program. In terms of the ESG-COVID, a total of (25) households were assisted, comprised of (82) persons. The decision to fund 100% to financial assistance and not to the shelters was made. The number of households and individuals assisted is determined as the project outcome. And although there are a number of households who qualified for homelessness prevention assistance (as indicated in the applicable table) and were served in PY 2019, no ESG-COVID funds were drawn (as reflected in the applicable table) until after PY 2019.

CR-75 – Expenditures

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2017	2018	2019
Expenditures for Rental Assistance	5,900	0	0
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	146	0	0
Expenditures for Housing Relocation & Stabilization Services - Services	3,941	0	0
Expenditures for Homeless Prevention under Emergency Shelter Grants Program	0	0	0
Subtotal Homelessness Prevention	9,987	0	0

Table 25 – ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2017	2018	2019
Expenditures for Rental Assistance	39,999	52,390	35,459.77
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	4,095	5,055	6,719.00
Expenditures for Housing Relocation & Stabilization Services - Services	9,855	22,787	27,076.29
Expenditures for Homeless Assistance under Emergency Shelter Grants Program	0	0	0
Subtotal Rapid Re-Housing	53,949	80,2232	69,255.06

Table 26 – ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2017	2018	2019
Essential Services	0	0	0
Operations	0	0	0
Renovation	0	0	0
Major Rehab	0	0	0
Conversion	0	0	0
Subtotal	0	0	0

Table 27 – ESG Expenditures for Emergency Shelter

11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2017	2018	2019
Street Outreach	0	0	0
HMIS	5,500	6,947	5,558.33
Administration	5,256	10,041	7,618.74

Table 28 - Other Grant Expenditures

11e. Total ESG Grant Funds

Total ESG Funds Expended	2017	2018	2019
	74,692	97,220	82,432.13

Table 29 - Total ESG Funds Expended

11f. Match Source

	2017	2018	2019
Other Non-ESG HUD Funds	0	0	0
Other Federal Funds	0	0	0
State Government	0	0	0
Local Government	0	0	0
Private Funds	0	0	0
Other	0	0	0
Fees	0	0	0
Program Income	0	0	0
Total Match Amount	0	0	0

Table 30 - Other Funds Expended on Eligible ESG Activities

11g. Total

Total Amount of Funds Expended on ESG Activities	2017	2018	2019
	74,692	97,220	82,413

Table 31 - Total Amount of Funds Expended on ESG Activities