

# **COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

**NORTHERN MARIANAS HOUSING CORPORATION  
P.O. BOX 500514, SAIPAN, MP 96950**

## **SUBSTANTIAL AMENDMENT to the PROGRAM YEAR 2021 ANNUAL ACTION PLAN**

**HOME Investment Partnerships Program – AMERICAN RESCUE PLAN  
March \_\_, 2023**

### **PURPOSE**

The Northern Marianas Housing Corporation (NMHC) prepared the CNMI's Program Year 2021 Annual Action Plan (PY2021 AAP), which describes the proposed projects and programs to be supported with HOME, Emergency Solutions Grant (ESG) and Community Development Block Grant (CDBG) funds. The PY2021 AAP and other documents are available for review at NMHC's website at <http://www.nmhc.gov.mp>.

The purpose of the Substantial Amendment to the CNMI's PY2021 AAP is to include NMHC's allocation and administration of HUD's new HOME American Rescue Plan (HOME-ARP) program.

### **BACKGROUND/DISCUSSION**

The American Rescue Plan Act of 2021 appropriated \$5 billion to help communities provide housing, shelter, and services for people experiencing homelessness, and other qualifying populations. Under the U.S. Department of Housing and Urban Development's (HUD) HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP), the CNMI, through its local public housing agency NMHC, is eligible to receive \$1,692,000 in HOME-ARP funds to address homeless needs through the creation of affordable housing or non-congregate shelter units and by providing tenant-based rental assistance or supportive services. This one-time funding creates significant opportunity to meet the housing and service needs of our community's most vulnerable populations.

To receive HOME-ARP funds, NMHC must engage in the consultation and public participation process in order to develop a HOME-ARP allocation plan. The plan must be submitted to HUD for review, as a substantial amendment to the PY2021 Annual Action Plan. The plan must also

describe the distribution of HOME-ARP funds and how it will be used to address the needs of HOME-ARP qualifying populations.

## **CITIZENSHIP PARTICIPATION**

**\*\*[The public hearing is scheduled for March 09, 2023, 6:00 p.m. at the NMHC Main Office Conference located in Garapan, Saipan]**

On March 9, NMHC conducted a public hearing. Members of the public were provided with HOME-ARP program information and NMHC's intent to administer the HOME ARP funds for the CNMI. In addition, consultation meetings and discussions were held throughout the development of the HOME-ARP allocation plan with agencies and organization addressing homelessness, domestic violence issues, and veteran needs. The list does not include another Public Housing Authority as NMHC is the designated housing agency for the CNMI to administer all the allocated funds received for the CNMI through HUD's various funding programs.

On March 6, 2023, NMHC published an NMI-wide, to the three populated islands of Saipan, Tinian, and Rota, the Notice of Public Comment (Notice) seeking input on the Substantial Amendment to the PY2021 AAP, which will set forth NMHC's HOME-ARP allocation plan and describe the distribution of HOME-ARP funds. The Notice is attached as Appendix B.

The Notice and the draft allocation plan were made available for review at the agency's website at <http://www.nmhc.gov.mp>. The deadline for written comments on the draft Substantial Amendment to the PY2021 AAP to include the NMHC HOME-ARP allocation plan was March \_\_\_\_ 2023. There were \_\_\_\_ public comments received during the minimum 15-day comment period.

## **SUBSTANTIAL AMENDMENT**

The PY2021 AAP will be amended to include \$1,692,000.00 of HOME-ARP funds and NMHC's HOME-ARP allocation plan, which describes the distribution of funds and the process for soliciting applications and selecting eligible projects.

NMHC proposes to allocate the CNMI HOME-ARP funds towards supportive service programs to providers that address the needs of the qualifying populations. The agency's HOME-ARP allocation plan is attached as Appendix A.

Appendix A: NMHC's HOME-ARP Allocation Plan

Appendix B: Notice of Public Hearing and Comment

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**HOME-ARP ALLOCATION PLAN**

**March \_\_, 2023**

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## **HOME-ARP ALLOCATION PLAN**

**Participating Jurisdiction:** COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

**Date:** March \_\_\_\_, 2023

### **INTRODUCTION**

In April 2021, the U.S. Department of Housing and Urban Development (HUD) announced the allocation of \$1,692,000.00 to the CNMI in the form of HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP) funds under the Fiscal Year (FY) 2021. This one-time funding was purposed with creating opportunity to meet housing and service needs of the CNMI’s most vulnerable populations. NMHC was designated as the responsible public housing agency to administer the allocated funds, which will be used to serve qualifying populations.

Under HOME-ARP, qualifying populations include the following:

- Sheltered and Unsheltered Homeless Populations
- Those currently housed at risk of homelessness
- Those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking
- Other populations: (1) requiring services or housing assistance to prevent homelessness, and (2) those at greatest risk of housing instability
- Veterans and families that include a veteran family member that meet one of the preceding criteria

Eligible activities under the HOME-ARP program include: the production or preservation of affordable rental housing; tenant-based rental assistance; supportive services, including homeless prevention services and housing counseling; and the purchase or development of non-congregate shelter for individuals and families experiencing homelessness. In addition, 15% of the total allocation may be used for planning costs and administration.

The development of HOME-ARP allocation plan involved consultation with homeless service providers, housing agencies, and other organizations and agencies that assist qualifying populations in areas that funds are to be utilized. In addition, submittal of a HOME-ARP Allocation Plan is required before receiving funds. This HOME-ARP Allocation Plan describes the distribution and intended use of HOME-ARP funds for the CNMI.

### **CONSULTATION**

In accordance with Section V.A of the CPD Notice 21-10 (page 13), a PJ must consult with:

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans’ groups,
- public housing agencies (PHAs),

- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

Summary of the consultation process:

The CNMI Homeless Coalition is made up of stakeholders committed toward preventing and ending homelessness. The Coalition is responsible for the operating and planning responsibilities of the Continuum of Care (CoC) and serves as the central hub that strengthens participation and coordination between CoC-funded activities, HUD-funded activities, and local government or private resources targeted at ending homelessness.

In order to seek information, data, and input on the needs of the qualifying populations in the CNMI, NMHC sought consultation with organizations that provide services for all or one or more of the qualifying populations. The list does not include another Public Housing Authority as NMHC is the designated housing agency for the CNMI to administer all the allocated funds received for the CNMI through HUD's various funding programs.

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*List the organizations consulted: [Incomplete]*

**\*\*\*[Consultation is still ongoing]**

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.

*Summarize feedback received and results of upfront consultation with these entities:*

**\*\*\*[Consultation process is still ongoing. This section will be updated as soon as the consultation process and relevant information have been received.]**

**Public Participation**

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive, and
- The range of activities the PJ may undertake.

***Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:***

- ***Date(s) of public notice:*** Click or tap to enter a date.
- ***Public comment period: start date*** - Click or tap to enter a date. ***end date*** - Click or tap to enter a date.
- ***Date(s) of public hearing:*** Click or tap to enter a date.

***Describe the public participation process:***

Enter narrative response here.

***Describe efforts to broaden public participation:***

Enter narrative response here.

## **Needs Assessment and Gaps Analysis**

**\*\*\*[THIS SECTION ANALYSIS AND NARRATIVES ARE CURRENTLY ONGOING]**

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.



## Homeless Needs Inventory and Gap Analysis Table

\*\*\*[DATA AND INFORMATION GATHERING IS ONGOING]

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	#	#	#	#	#								
Transitional Housing	#	#	#	#	#								
Permanent Supportive Housing	#	#	#	#	#								
Other Permanent Housing	#	#	#	#	#								
Sheltered Homeless						#	#	#	#				
Unsheltered Homeless						#	#	#	#				
<b>Current Gap</b>										#	#	#	#

**Suggested Data Sources:** 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

## OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	#		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	#		
Rental Units Affordable to HH at 50% AMI (Other Populations)	#		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		#	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		#	
<b>Current Gaps</b>			#

**Suggested Data Sources:** 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

***Describe the size and demographic composition of qualifying populations within the PJ's boundaries:***

***Homeless as defined in 24 CFR 91.5***

Enter narrative response here.

***At Risk of Homelessness as defined in 24 CFR 91.5***

Enter narrative response here.

***Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice***

Enter narrative response here.

***Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice***

Enter narrative response here.

***Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):***

Enter narrative response here.

***Describe the unmet housing and service needs of qualifying populations:***

***Homeless as defined in 24 CFR 91.5***

Enter narrative response here.

***At Risk of Homelessness as defined in 24 CFR 91.5***

Enter narrative response here.

***Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice***

Enter narrative response here.

***Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice***

Enter narrative response here.

***Identify any gaps within the current shelter and housing inventory as well as the service delivery system:***

Enter narrative response here.

***Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-***

***ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:***

Enter narrative response here.

***Identify priority needs for qualifying populations:***

Enter narrative response here.

***Explain how the PJ determined the level of need and gaps in the PJ’s shelter and housing inventory and service delivery systems based on the data presented in the plan:***

Enter narrative response here.

## **HOME-ARP Activities**

***Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:***

Enter narrative response here.

***Describe whether the PJ will administer eligible activities directly:***

Enter narrative response here.

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ #		
Acquisition and Development of Non-Congregate Shelters	\$ #		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ #		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ #	# %	15%
<b>Total HOME ARP Allocation</b>	\$ #		

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