

## 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 2023 projects addressed several goals such as:

- Public Facilities and Improvements
- Special Needs and Low-Mod Income Housing
- Increase Number of Homeowner Education and Counseling
- Sustain and Expand Affordable Housing Stock
- Public Services
- Community Enhancement
- Promotes Fair Housing
- Provide Services to the Homeless Population

The PY 2023 projects included: Childcare Facility (Rota), Multipurpose Stage (Rota), Community Pavilion Shelters (Rota), PY 2023 Planning and Administrative Costs, PY 2023 HOME Administrative Costs, Homeowner Rehabilitation, Homeownership Assistance, Homeless Prevention Assistance, Rapid Re-housing Assistance, HMIS, and PY 2023 HESG Planning and Administrative Costs. CDBG projects were initialized, but no projects (funded with PY 2023 monies) were completed within PY 2023. The PY 2023 projects selected (80% of the allocation are for direct project costs) were for Public Facilities and Improvement projects while 20% of the remaining funds were committed to Planning and Administrative costs. Planning and Administrative costs involve monitoring projects for regulatory compliance, processing of payment requests, and implementation of proposed priorities and goals established in the Consolidated Plan. HOME- Homeowner Rehabilitation Program met several goals: 1) Sustain affordable housing stock 2) Special Needs and low-mod income housing and 3) Expand Affordable Housing Stock. Furthermore, NMHC closed nine (9) loans for the period and completed eight (8) homes for the period. Through the HESG Program, the goal of special needs and low-mod income housing was met, particularly addressing the homelessness priority need. NMHC's goal was to assist up to six (6) households with rapid re-housing and homeless prevention assistance. A total of nineteen (19) households were assisted in PY 2023. A total of twelve (12) households were assisted with rapid re-housing assistance and a total of seven (7) households were assisted with homelessness prevention 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.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Community Enhancement	Non-Housing Community Development	CDBG: \$980,125	Other	Other	3	3	00.00%	3	3	0.00%
Disaster Recovery	Affordable Housing Homeless Non-Housing Community Development	CDBG: \$0 / HOME: \$0 / ESG: \$0 / HTF: \$0	Rental Units constructed	Household Housing Unit	65	0	0.00%	0	0	0.00%
Disaster Recovery	Affordable Housing Homeless Non-Housing Community Development	CDBG: \$0 / HOME: \$0 / ESG: \$0 / HTF: \$0	Rental Units Rehabilitated	Household Housing Unit	50	0	0.00%	0	0	0.00%

Disaster Recovery	Affordable Housing Homeless Non-Housing Community Development	CDBG: \$0 / HOME: \$0 / ESG: \$0 / HTF: \$0	Homeowner Housing Added	Household Housing Unit	40	17	0.00%	8	17	200.00%
Disaster Recovery	Affordable Housing Homeless Non-Housing Community Development	CDBG: \$0 / HOME: \$0 / ESG: \$0 / HTF: \$0	Homeowner Housing Rehabilitated	Household Housing Unit	35	9	0.00%	7	9	0.26%
Disaster Recovery	Affordable Housing Homeless Non-Housing Community Development	CDBG: \$0 / HOME: \$0 / ESG: \$0 / HTF: \$0	Direct Financial Assistance to Homebuyers	Household Assisted	35	6	0.00%	5	6	120.00%
Disaster Recovery	Affordable Housing Homeless Non-Housing Community Development	CDBG: \$0 / HOME: \$0 / ESG: \$0 / HTF: \$0	Other	Other	20	0	00.00%	5	1	20.00%

Emergency Shelter/Transitional Housing	Affordable Housing Homeless	ESG/CDBG	Other	Other	2	0	0.00%	0	0	0.00%
Expand Housing Stock	Affordable Housing Non-Homeless Special Needs Special needs population	HOME: \$489,268	Homeowner Housing Added	Household Housing Unit	10	4	0.00%	3	8	266.66%
Expand Housing Stock	Affordable Housing Non-Homeless Special Needs Special needs population	HOME: \$489,268	Direct Financial Assistance to Homebuyers	Household Assisted	10	4	0.00%	3	8	266.66%
Infrastructure Improvement	Non-Housing Community Development	CDBG: \$980,125	Other	Other	0	0	0.00%	0	0	0.00%
Job Creation/Retention	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$980,125	Jobs Created/Retained	Households Assisted	3	0	0.00%	1	0	0.00%

Promote Fair Housing	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Special Needs population	CDBG: \$980,125	Other	Other	5	0	0.00%	1	0	0.00%
Provide Services to the Homeless	Homeless	ESG: \$81,200	Tenant-based rental assistance / Rapid Rehousing	Household Assisted	6	12	200.00%	6	12	200%
Provide Services to the Homeless	Homeless	ESG: \$81,200	Homeless Prevention	Other	6	7	117.00%	6	7	117.00%
Public Facilities and Improvements	Non-Housing Community Development	CDBG: \$980,125	Other	Other	10	6		3	0	0.00%
Public Services	Non-Housing Community Development Special Needs population	CDBG: \$980,125	Other	Other	4	1	25.00%	1	0	000.00%

Sustain Affordable Housing Stock	Affordable Housing Non-Homeless Special Needs population	HOME: \$489,268	Rental Units Rehabilitated	Household Housing Unit	0	0	0.00%	0	0	0.00%
Sustain Affordable Housing Stock	Affordable Housing Non-Homeless Special Needs Special Needs population	HOME: \$489,268	Homeowner Housing Rehabilitated	Household Housing Unit	15	5	0.00%	2	1	50.00%

**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.**

See Below for details on the project, which addresses the need of public facilities and improvements in the CNMI

**Childcare Facility (Rota)**- The Department of Community and Cultural Affairs submitted a proposal for the construction of a Childcare Facility on the island of Rota. Currently, there are no childcare facilities on Rota, and families would have to rely on relatives to provide childcare for their children. The facility will be monitored by the Childcare Development Fund Program (CCDF). The CCDF will determine the operators of the facility before construction is completed. These activities are eligible under 24 CFR 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-funded amount: \$450,000.00; National Objective: LMA 24 CFR Part 570.208(a)(1)(i).

**Multipurpose Stage (Rota)**- The Office of the Mayor of Rota submitted a proposal for a multipurpose stage facility for the island of Rota. The purpose of the facility is to centralize and dedicate an area to serve municipal/community/school-sponsored events as well as other organizational and club events. Currently, there is no such facility on the island of Rota. These activities are eligible under 24 CFR 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 Funded amount: \$230,000.00; National Objective: LMA 24 CFR Part 570.208(a)(1)(i),

**Community Pavilion Shelters (Rota)**- The Office of the Mayor of Rota submitted a proposal for community pavilion shelters for the island of Rota. The community of Rota, specifically, is in dire need of the municipality's assistance to provide better and more reliable shelters for the community to engage with one another in order to enhance the programs, activities, and services to be offered. Rota residents could not afford to continue to use canopies to serve their needs and neither does the Office of the Mayor. Thus, it is important to address this concern through this funding opportunity to alleviate the hardships both parties continue to suffer. These activities are eligible under 24 CFR Part 570.201 ( c ). National objective: LMA 24 CFR Part 570.208 (a)(1)(i). The Project meets goal #5- to construct or rehabilitate facilities, including recreational facilities and youth centers that will improve services to the general public. CDBG Funded amount: \$104,100.00

**Housing Trust Fund (HTF)** - The CNMI will use the funds to administer the HTF Program through a non profit or for profit organization on the island of Saipan. The HTF Funds will be used to construct, rehabilitate, a unit to be used for rental housing. The program will benefit households with an income of 30% or less of area median income. PY2021 Allocation: \$187,243; PY2022 Allocation: \$205,677; PY2023 Allocation: \$76,533.43

**Homeowner Rehabilitation Program**- The goal was to assist two (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 comply with local building code standards and/or modify them to meet ADA standards. NMHC completed one (1) rehabilitated home in PY 2023.

**HOME Direct Homeownership Assistance**- The goal was to assist three (3) households per year for new construction and one (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 sessions. The project addresses the need for affordable housing in the CNMI. NMHC closed on five (5) loans for first time, qualified homeowners for the period.

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 the HESG fund to assist up to six (6) households per year. A total of nineteen (19) households were assisted in PY 2023.



**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)

	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>	<b>HTF</b>
White	0	0	0	0
Black or African American	0	0	0	0
Asian	22,054	0	6	0
American Indian or American Native	0	0	0	0
Native Hawaiian or Other Pacific Islander	20,665	5	66	0
<b>Total</b>	<b>47,329</b>	<b>5</b>	<b>72</b>	<b>0</b>
Hispanic		0	0	00
Not Hispanic	0	0	0	0

**Table 2 – Table of assistance to racial and ethnic populations by source of funds**

**Narrative**

The total population in the CDBG column above, serves the entire CNMI with a population of 47,329. The table does not reflect 1157 persons under “other races” and 3,453 under “two or more races”. The White, Black or African American, American Indian or American Native, Hispanic, and Not Hispanic categories totals are included in the “other races” and “two or more races”. The HOME column reflects the number of households assisted, and the ESG column reflects the number of persons assisted (as demonstrated in HMIS)

## 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	980,125	13,770.92
HOME	public - federal	489,268	367,504.90
ESG	public - federal	81,200	122,759.71
HTF	public - federal	76,533.43	278,970.36

Table 3 - Resources Made Available

### Narrative

Expenditures are inclusive of administrative-related costs for each prospective grant.

#### CDBG

In this table, NMHC inputted Resources made available for the CDBG Program (PY 2023 allocation).

#### ESG

The CNMI continues to utilize its ESG funds for rapid re-housing and homeless prevention services. Fund draws were used towards rapid rehousing services which include housing relocation and stabilization services and financial assistance, and HMIS. As homelessness is an increasing problem in the CNMI, the CNMI focuses on assisting literally homeless families and individuals to move into decent homes, and through NMHC, work with the ESG -assisted households to sustain their housing status and improve their lives. The CNMI receives an allocation of approximately \$81,200 annually. Draws made from the previous regular HESG are reflected in the table.

#### HOME

In the reporting year, a total of nine (9) households became homeowners and one (1) household was able to rehabilitate their home. Eight (8) HOME loans were closed during PY23. The CNMI received a HOME allocation amount of \$489,268 in HOME funds which was spent within the program year (this is inclusive of drawdowns from previous year HOME allocations).

#### HTF

In the reporting year, the HTF project was an ongoing activity. The HTF funds expended during PY 2023 is inclusive of PY 2021 and PY 2022 allocations.

**Identify the geographic distribution and location of investments**

<b>Target Area</b>	<b>Planned Percentage of Allocation</b>	<b>Actual Percentage of Allocation</b>	<b>Narrative Description</b>
Rota	0	32	U.S. Territory
Saipan	0	0	U.S. Territory
Tinian	0	68	U.S. Territory

**Table 4 – 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 other island territories, projects will impact the CNMI community in its entirety. 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 2020 low-mod data by the American Community Survey, Saipan’s population is 41,927 of which 29,200 or 70% are low-mod income. Tinian’s population is 1,958 of which 1,368 or 70% are low-mod income. Rota’s population is 1,869 of which 1,303 or 70% 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 felt. In PY 2023, a total of three (3) projects were selected by the CDBG selection committee to be located on the island of Rota. The percentage of funds reflected above is a percentage of the total 80% of the CDBG allocation (for project costs). 20% or \$196,000 is allocated for planning and admin expenses.

## 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.

<b>Fiscal Year Summary – HOME Match</b>	
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 5 – 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 6 – 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 \$
221,540	221,540	157,253	0	64,287

Table 7 – 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	
<b>Contracts</b>						
Dollar Amount	487,010	0	487,010	0	0	0
Number	4	0	4	0	0	0
<b>Sub-Contracts</b>						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

	Total	Women Business Enterprises	Male
<b>Contracts</b>			
Dollar Amount	487,010	249,500	237,510
Number	6	4	2
<b>Sub-Contracts</b>			
Number	0	0	0
Dollar Amount	0	0	0

**Table 8 - 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 9 – 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 10 – 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.**

	<b>One-Year Goal</b>	<b>Actual</b>
Number of Homeless households to be provided affordable housing units	6	21
Number of Non-Homeless households to be provided affordable housing units	8	3
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>14</b>	<b>24</b>

**Table 11 – Number of Households**

	<b>One-Year Goal</b>	<b>Actual</b>
Number of households supported through Rental Assistance	6	21
Number of households supported through The Production of New Units	4	1
Number of households supported through Rehab of Existing Units	2	1
Number of households supported through Acquisition of Existing Units	2	1
<b>Total</b>	<b>14</b>	<b>110</b>

**Table 12 – Number of Households Supported**



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

**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 lead 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. There are also a number of households on the CDBG-DR homebuyer/new construction waitlist that could not be assisted due to the lack of funds.

**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.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>	<b>HTF Actual</b>
Extremely Low-income	0	0	0
Low-income	0	5	0
Moderate-income	0	0	0
<b>Total</b>	<b>0</b>	<b>5</b>	<b>0</b>

**Table 13 – Number of Households Served**

**Narrative Information**

The CNMI will continue to provide HOME assistance to qualified extremely low to moderate income homeowners to rehabilitate, construct, or for the acquisition and repair of their primary place of residence. Moreover, the CNMI will continue to make decent, safe, sanitary, and housing affordable through the HOME deferred loans and grants for those families that fall within the extremely low income categories.

## **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**

NMHC continues in the administration of the ESG Programs and conducts case management for literally homeless and at risk of homeless households. Further, NMHC: Supported the work of non profit organizations and the public sectors 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 offers services to those who are likely to become homeless after being discharged from a publicly funded institution and the Independent Living Center who offers life skill training to a special needs population; NMHC did not conduct a point-in-time survey in the last fiscal year due to the lack of volunteers to conduct the survey.

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

As mentioned above, NMHC continues to support the programs of the Transitional Living Center who offers 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 January 2020 (last PIT count conducted due to the Coronavirus pandemic) 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**

NMHC continues to allocate HESG funding to support the non profit organizations who will be conducting case management for literally homeless and at risk of homelessness households. NMHC also: Supported the work of non profit organizations and the public sectors 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 offers services to those who are likely to become

homeless after being discharged from a publicly funded institution and the Independent Living Center who offers life skill training to a special needs population; NMHC conducted a point-in-time survey in January 2018 and submitted a CoC grant application in October 2018.

**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**

NMHC continues in the implementation of the HESG funding by directly administering the program. NMHC also conducts case management for literally homeless and at risk of homelessness households. Further, NMHC: Supported the work of non-profit organizations and the public sectors 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.

## **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 households;
- 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. There were no households admitted within PY 2023. However, to date, a total of (19) households are currently enrolled. Two (2) families have achieved their goals in the FSS program and have exited from the Section 8 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 for landlords and tenants. A Fair Housing briefing is also 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 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.

### **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)**

NMHC is currently working on reducing the waiting list for the Section 8 program. As of date, there are 500+ households on the waiting list. Clients are required to update their status with the housing specialists 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 being 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 discussions with various entities, the underserved population are people with disabilities. In the PY 2021 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 the HOME loan and Section 8 Program and are at poverty level. NMHC is currently in discussion with the Council on Development 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 currently also a movement in the CNMI to ensure all facilities are accessible to people with disabilities. In addition, the Center for Living Independently was allocated CDBG-COVID funds to implement a food pantry program to serve people with disabilities. The program launched in May 2021 and is nearing close out.

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

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. The NMHC continued the Emergency Solutions Grant Program 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, serving those who were impacted by the COVID 19 pandemic. A total of (111) households, comprised of (417) persons were assisted with the program.
2. NMHC worked proactively with the current Section 8 households and assisted (32) families into the FSS Program, so they are able to gain selfsufficiency, 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)**

In addition, one of the actions taken above in developing institutional structure is NMHC continuously working 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 2021, and implemented the CD BG-DR Program, where a portion of the funds, about \$30M was allocated to particularly rehab and construct additional rental units, to address unmet needs. The CN MI 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)**

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**

NMHC ensures compliance with local and federal procurement regulations. For projects 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 will submit all required documentation. The monitoring process will involve recurrent communication in person, telephone, emails, on-site visits, and regularly scheduled meetings with the Subrecipients. Moreover, the Planning Division with the Fiscal Division will continue to monitor funding through the IDIS system and a separate monitoring system that is maintained by both Divisions. Such a procedure will ensure that all payment requests and progress billings are accurate and that there is sufficient funding for each activity. For the environmental assessments that are required of each project, the Planning Division will 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' work progress to avoid delays in a project's completion time. As part of the monitoring process, 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. During the construction of a project, frequent physical inspections are performed by the Asset Manager. The Asset Manager will ensure that the contractor is complying with HUD Labor Standards by conducting employee interviews and collecting payroll schedules. 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 on-site visits and address set-backs by communicating with the Subrecipients until the issues have been resolved. As with the HOME Program, the EA process is the same as that of CDBG's. The Asset Manager conducts inspections of the HOME assisted units with the Department of Public Works during the construction phase. Any technical flaws are addressed immediately. The loan specialists communicate with the contractors and the HOME assisted households mainly through frequent phone calls. All financial activities are monitored through IDIS. Minority business outreach is conducted in the CDBG and HOME programs by the inclusion of notices in the bid packet. The ESG Program Subgrantee is also monitored by NMHC. NMHC conducts inspections of random files to ensure that all requirements are adhered to and documentation is in place. The payment to the utility company and landlord is routed internally at NMHV and are approved by the Planning Division, Fiscal Division, and the Corporate Director. All financial activities are monitored through IDIS.

### **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 comments.

**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 2023. 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**

refer to 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 2021, (0) home was rehabilitated in the HOME Program, (3) homes completed a new construction, and (1) home was acquired and rehabilitated. 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 12-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 (19) households comprised of (72) individuals were assisted in the regular ESG 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 has not implemented the HTF program in the CNMI

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
Rental	0	0	0	0	0	0
Homebuyer	0	0	0	0	0	0

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

### CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

<b>Total Labor Hours</b>	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>	<b>HOPWA</b>	<b>HTF</b>
Total Number of Activities	67,310	0	0	0	0
Total Labor Hours		0	0		0
Total Section 3 Worker Hours		0	0		0
Total Targeted Section 3 Worker Hours		0	0		0

**Table 15 – Total Labor Hours**

<b>Qualitative Efforts - Number of Activities by Program</b>	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>	<b>HOPWA</b>	<b>HTF</b>
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	3	0	0		0
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0	0	0		0
Direct, on-the job training (including apprenticeships).	3	0	0		0
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0	0	0		0
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0	0	0		0
Outreach efforts to identify and secure bids from Section 3 business concerns.	0	0	0		0
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0	0	0		0
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0	0	0		0
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0	0	0		0
Held one or more job fairs.	0	0	0		0
Provided or connected residents with supportive services that can provide direct services or referrals.	0	0	0		0
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0	0	0		0

Assisted residents with finding child care.	0	0	0		0
Assisted residents to apply for, or attend community college or a four year educational institution.	0	0	0		0
Assisted residents to apply for, or attend vocational/technical training.	0	0	0		0
Assisted residents to obtain financial literacy training and/or coaching.	0	0	0		0
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0	0	0		0
Provided or connected residents with training on computer use or online technologies.	0	0	0		0
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0	0	0		0
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0	0	0		0
Other.	0	0	0		0

**Table 16 – Qualitative Efforts - Number of Activities by Program**

**Narrative**

HOME section 3 hours were not collected in the past PY. NMHC will assure that Section 3 hours are collected in the current and future program years.

**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**

<b>Recipient Name</b>	NORTHERN MARIANA ISLANDS
<b>Organizational DUNS Number</b>	854856277
<b>EIN/TIN Number</b>	986019463



**Identify the Field Office** HONOLULU

**Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance** Northern Mariana Islands CoC

**ESG Contact Name**

**Prefix** Mr

**First Name** Jesse

**Middle Name** S

**Last Name** Palacios

**Suffix** 0

**Title** Deputy Director

**ESG Contact Address**

**Street Address 1** P.O. Box 500514

**Street Address 2** 0

**City** Saipan

**State** MP

**ZIP Code** -

**Phone Number** 6702346866

Extension 0  
Fax Number 6702349021  
Email Address jspalacios@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 10/01/2023  
Program Year End Date 09/30/2024

**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	10
Children	19
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>29</b>

Table 16 – Household Information for Homeless Prevention Activities

#### 4b. Complete for Rapid Re-Housing Activities

Number of Persons in Households	Total
Adults	17
Children	26
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>43</b>

Table 17 – Household Information for Rapid Re-Housing Activities

#### 4c. Complete for Shelter

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

**Table 18 – Shelter Information**

#### 4d. Street Outreach

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

Table 19 – Household Information for Street Outreach

#### 4e. Totals for all Persons Served with ESG

<b>Number of Persons in Households</b>	<b>Total</b>
Adults	27
Children	45
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>72</b>

Table 20 – Household Information for Persons Served with ESG

## 5. Gender—Complete for All Activities

	<b>Total</b>
Male	35
Female	37
Transgender	0
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>72</b>

**Table 21 – Gender Information**

**6. Age—Complete for All Activities**

	<b>Total</b>
Under 18	44
18-24	3
25 and over	25
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>72</b>

**Table 22 – Age Information**

**7. Special Populations Served—Complete for All Activities**

**Number of Persons in Households**

<b>Subpopulation</b>	<b>Total</b>	<b>Total Persons Served – Prevention</b>	<b>Total Persons Served – RRH</b>	<b>Total Persons Served in Emergency Shelters</b>
Veterans	0	0	0	0
Victims of Domestic Violence	0	0	0	0
Elderly	0	0	0	0
HIV/AIDS	0	0	0	0
Chronically Homeless	0	0	0	0

<b>Persons with Disabilities:</b>				
Severely Mentally Ill	0	0	0	0
Chronic Substance Abuse	0	0	0	0

<b>Persons with Disabilities:</b>				
Other Disability	0	0	0	0
Total (Unduplicated if possible)	0	0	0	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 (17) households comprising (72) individuals were assisted. 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.

## CR-75 – Expenditures

### 11. Expenditures

#### 11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2021	2022	2023
Expenditures for Rental Assistance	0	38,948	32,556.00
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	9,698	6,643.27
Expenditures for Housing Relocation & Stabilization Services - Services	0	0	0
Expenditures for Homeless Prevention under Emergency Shelter Grants Program	0	0	0
<b>Subtotal Homelessness Prevention</b>	<b>0</b>	<b>48,646</b>	<b>0</b>

Table 25 – ESG Expenditures for Homelessness Prevention

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#### 11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2021	2022	2023
Expenditures for Rental Assistance	0	46,326	67,752.66
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	10,021	13,504.60
Expenditures for Housing Relocation & Stabilization Services - Services	0	0	0
Expenditures for Homeless Assistance under Emergency Shelter Grants Program	0	0	0
<b>Subtotal Rapid Re-Housing</b>	<b>0</b>	<b>56,347</b>	<b>0</b>

Table 26 – ESG Expenditures for Rapid Re-Housing

**11c. ESG Expenditures for Emergency Shelter**

	Dollar Amount of Expenditures in Program Year		
	2021	2022	2023
Essential Services	0	0	0
Operations	0	0	0
Renovation	0	0	0
Major Rehab	0	0	0
Conversion	0	0	0
<b>Subtotal</b>	<b>0</b>	<b>0</b>	<b>0</b>

**Table 27 – ESG Expenditures for Emergency Shelter**

**11d. Other Grant Expenditures**

	Dollar Amount of Expenditures in Program Year		
	2021	2022	2023
Street Outreach	0	0	0
HMIS	0	5,000	1556.07
Administration	0	1,190	747.11

**Table 28 - Other Grant Expenditures**

**11e. Total ESG Grant Funds**

Total ESG Funds Expended	2021	2022	2023
	0	11,983	122,759.71

**Table 29 - Total ESG Funds Expended**

**11f. Match Source**

	<b>2021</b>	<b>2022</b>	<b>2023</b>
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
<b>Total Match Amount</b>	<b>0</b>	<b>0</b>	<b>0</b>

**Table 30 - Other Funds Expended on Eligible ESG Activities**

**11g. Total**

<b>Total Amount of Funds Expended on ESG Activities</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
	46,776	58,393	122,759.71

**Table 31 - Total Amount of Funds Expended on ESG Activities**