

**2015 COMMONWEALTH OF THE
NORTHERN MARIANA ISLANDS
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING
CHOICE**



**DRAFT REPORT FOR PUBLIC REVIEW
NOVEMBER 10, 2015**

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Draft Report for Public Review

November 10, 2015

HAS YOUR RIGHT TO FAIR HOUSING BEEN VIOLATED?

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Office of Fair Housing and Equal Opportunity
Department of Housing and Urban Development
451 Seventh Street SW, Room 5204
Washington, DC 20410-2000

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Web Site: <http://www.HUD.gov/offices/fheo/online-complaint.cfm>

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EXECUTIVE SUMMARY

AI PURPOSE AND PROCESS

As a requirement of receiving funds under the Community Development Block Grant (CDBG), the HOME Investment Partnerships (HOME), and the Emergency Solutions Grant (ESG), entitlement jurisdictions must submit certification of affirmatively furthering fair housing to the U.S. Department of Housing and Urban Development (HUD). This certification has three elements:

1. Complete an Analysis of Impediments to Fair Housing Choice (AI),
2. Take actions to overcome the effects of any impediments identified, and
3. Maintain records reflecting the actions taken in response to the analysis.

In the *Fair Housing Planning Guide*, page 2-8, HUD provides a definition of impediments to fair housing choice as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices [and]
- Any actions, omissions, or decisions which have [this] effect.¹

The list of protected classes included in the above definition is drawn from the Federal Fair Housing Act, which was first enacted in 1968. However, state, insular, and local governments may enact fair housing laws that extend protection to other groups, and the AI is expected to address housing choice for these additional protected classes as well.

The AI process affirmatively furthers fair housing involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, and housing transactions, particularly for persons who are protected under fair housing law.

The development of an AI also includes public input and review via direct contact with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified impediments.

METHODOLOGY

As part of the consolidated planning process, and as a requirement for receiving HUD formula grant funding, the Commonwealth of the Northern Mariana Islands is undertaking this AI to evaluate impediments to fair housing choice. Residents of the Northern Mariana Islands are protected from discrimination in housing choice by the Federal Fair Housing Act, which includes protections based on race, color, religion, national origin, sex, disability, and familial

¹ U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide*. Vol. 1, p. 2-8. http://www.hud.gov/offices/cpd/about/conplan/fairhousingexs/Module5_TopSevenAFFH.pdf

status². Commonwealth law prohibits discrimination on these same bases while providing additional protection from discrimination based on marital status.³

The purpose of this report is to determine current impediments to fair housing choice at work in the Northern Mariana Islands and to suggest actions that the local community can consider in order to overcome the identified impediments. Thus, this report represents only the first step in the three-part certification process presented on the previous page.

This AI was conducted through the assessment of a number of quantitative and qualitative sources. Quantitative sources used in analyzing fair housing choice in the Commonwealth of the Northern Mariana Islands included:

- Socio-economic and housing data from the U.S. Census Bureau,
- Investment data gathered in accordance with the Community Reinvestment Act,
- Housing complaint data from HUD.

Qualitative research included evaluation of relevant existing fair housing research and national and local fair housing legal cases. Additionally, this research included the evaluation of information gathered from the 2015 Commonwealth of the Northern Mariana Islands Fair Housing Survey.

Geographic analyses of racial and ethnic distribution were conducted by calculating race or ethnicity as the percentage of total population and then plotting the data on a geographic map of Census block groups in the Commonwealth of the Northern Mariana Islands. For the purposes of this AI, maps were produced for several racial and ethnic groups based on both 2000 and 2010 Census data in order to examine how the concentrations of these populations changed over time.

Ultimately, a list of potential impediments was drawn from these sources and further evaluated based on HUD's definition of impediments to fair housing choice, as presented on the previous page. Potential impediments to fair housing choice present within the Northern Mariana Islands were identified; along with actions the Commonwealth may consider in attempting to address possible impediments.

OVERVIEW OF FINDINGS

This AI includes a review of both public and private sector housing market contexts in the Commonwealth of the Northern Mariana Islands to identify practices or conditions that may operate to limit fair housing choice in the CNMI. Analysis of demographic, economic, and housing data included in that review establish the context in which housing choices are made. Demographic data indicate the sizes of racial and ethnic populations and other protected classes; economic and employment data show additional factors in influencing housing choice; and counts of housing by type, tenure, quality, and cost indicate the ability of the housing stock to meet the needs of CNMI residents.

² 42 U.S.C.A. §3601

³ 2 CMC §40101, et seq.

The contextual analysis described above provides a foundation for a review of fair housing laws, studies, and trends. The structure provided by local, insular, and Federal fair housing laws shapes the complaint and advocacy processes available to CNMI residents, as do the services provided by local and Federal agencies. Private sector factors in the homeownership and rental markets have a considerable influence on fair housing choice. Public sector policies and practices can also significantly affect housing choice.

Public involvement feedback further helps to define problems and possible impediments to housing choice, and support findings from the contextual and supporting data.

Socio-Economic Context

Demographic

The total population of the Northern Mariana Islands fell considerably between 2000 and 2010, owing in large part to a decline in the number of residents aged 20 to 34. This decline marked a shift in the composition of the Northern Marianas population: In 2000, more than forty percent of residents were aged 20 to 34. By 2010, residents in that age range accounted for less than 18 percent of the Commonwealth population. By contrast, the islands saw marked growth in the number of residents aged 55 and older.

Over one quarter of the Commonwealth population resided in “group quarters” in 2000, or 17,791 residents. Most of these residents lived in “other institutional” settings, a category which includes worker dormitories. By 2010, the number of residents living in group quarters had fallen to 1,571 throughout the Commonwealth. It is probable that the group quarters population was composed primarily of workers in the textile industry, largely migrant laborers from China and other Asian countries. Excluding these residents from population figures suggest that the population that was not living in group quarters actually increased, from 51,430 in 2000 to 52,312 in 2010.

The racial and ethnic composition of the population changed between 2000 and 2010: this was most pronounced in the marked increase in the number of residents who identified themselves as belonging to two or more racial/ethnic groups. From 4.8 percent of the population in 2000, the multi-racial/ethnic population grew to 12.7 percent by 2010, more than doubling in number in the process. Asian residents constituted a majority of the single-race/single-ethnicity (SRSE) population in both years; however, the number of Asian residents fell by 30.9 percent over the decade. The decline in population was slower among Native Hawaiian/Pacific Islander residents, who represented a larger share of the SRSE population in 2010 than they had in 2000. Among Native Hawaiian/Pacific Islander residents, 68.6 percent were Chamorro, and 13.1 percent were Carolinian. Among Asian residents, 70.7 percent were Filipino, and 13.6 percent were Chinese.

Geographically, Asian residents tended to make up larger shares of the population in Census block groups on the west coast of Saipan and around central San Jose on Tinian. The Native Hawaiian/Pacific Islander population, on the other hand, represented larger shares of the population in eastern block groups on Saipan, rural areas of Tinian, and throughout the island of Rota. The highest concentrations of residents who identified themselves as multi-racial/ethnic appeared in northern and eastern block groups on Saipan.

Around 14 percent of the Commonwealth population was counted as living with some form of disability in 2000. The highest concentrations of residents with disabilities were observed in block groups along the western coast of Saipan, where as much as 57.7 percent of the population was living with a disability. Similar concentrations of residents with disabilities were not observed in 2010, when residents with disabilities accounted for 5.5 percent of the population overall. It should be noted that the Census questionnaire from 2010 differed considerably from that of the 2000 Census where disability is concerned. For that reason, the Census Bureau discourages direct comparisons between the two: it would not be correct to conclude, for example, that the share of residents with disabilities actually declined from 14 to 5.5 percent, since those two figures are based on substantively different criteria for who is to count as living with a disability.

Economics

Even as the overall population declined, and with it the size of the Commonwealth labor force, the number and share of workers who were unemployed rose considerably. Around 4 percent of people in the labor force were unable to find work in 2000, or 1,712 workers. By 2010, the number of workers who were unable to find employment had risen to 3,123, representing 11.2 percent of the labor force. This overall trend was not reflected on Tinian, where the unemployment rate fell slightly over the decade. Though female workers were less likely than their male counterparts to be unemployed in 2000, growth in the unemployment rate was considerably more rapid among female workers. By 2010, some 13 percent of the female labor force in the Commonwealth was unemployed.

The decade between 2000 and 2010 saw the collapse of the Commonwealth's manufacturing sector. In 2000, more than 17,000 Northern Mariana residents worked in manufacturing, or 40.7 percent of the working population. By 2010, fewer than 700 workers had manufacturing jobs, or 2.8 percent of the working population. The largest industry in the Commonwealth in 2010, in terms of employment, was the arts, entertainment, and food services industry, which accounted for 22.2 percent of the jobs in the CNMI, followed by the educational, health, and social services industry, which provided 12.4 percent of jobs.

As the Commonwealth's labor force declined and the overall unemployment rate rose, higher-income households came to account for a smaller share of households overall. The percentage of households earning \$30,000 per year or more fell from 40.2 to 35 percent. At the same time, the share of households earning less than \$25,000 per year rose by around five percentage points. These trends were generally reflected on the islands individually, though Tinian saw an increase in the percentage of households in the low- to middle-income range, with declines the shares of households at the low and high ends of the income range.

The overall poverty rate rose between 2000 and 2010, from 46 to 52.3 percent. The highest geographic concentrations of residents living in poverty were observed on the west coast of Saipan, particularly in and around Susupe, Lower Base, and Puerto Rico. Poverty rates tended to be lower on Tinian and Rota, though there were above-average concentrations of impoverished households in and around Songsong, along with San Jose on Tinian. In 2010, block groups on the west coast of Saipan continued to hold relatively high concentrations of residents living in poverty.

Housing

More than two-thirds of occupied housing units were occupied by rental tenants in 2000, a share that grew to 71.7 percent over the following decade. The Commonwealth housing stock grew more rapidly than the number of households between the 2000 and 2010 Census counts, resulting in a higher vacancy rate at the end of the decade: 23.1 percent in 2010, up from 20 percent in 2000. A majority of vacant units were available for rent in both years. However, a relatively large share of units were classified as “other vacant”, and this share grew from 31.4 to 33.5 percent of all vacant units between 2000 and 2010. “Other vacant” units tend to be more problematic than other types of housing units, as they are not available to the marketplace and may contribute to blight where they are grouped in close geographic proximity. In 2010, the areas around Kagman had relatively high concentrations of “other vacant” units.

Though a majority of housing units in the Commonwealth were single-family units, the share of apartment units grew from 26.4 to 32 percent from 2000 through 2010 as 2,034 units were added to the housing stock. Meanwhile, single-family units declined as a share of the housing stock, from 62.3 to 58.1 percent.

The average household size declined between the 2000 and 2010 Censuses, from 3.66 persons per household to 3.26, while the number of households in the Commonwealth grew. Smaller households, i.e., those with less than five members, increased in number and as a share of all housing units in the Commonwealth as a whole, while households with five or more members represented a smaller percentage of Commonwealth households at the end of the decade.

As households decreased in size between 2000 and 2010, over-crowding generally became less common. Housing units are considered overcrowded when they included between 1 and 1.5 members per room; severely overcrowded when they include more than 1.5 members per room. Around 15.4 percent of housing units were overcrowded in 2010, down from 16 percent in 2000. At the same time, the percentage of housing units that were severely overcrowded fell by half, from 28.8 to 13.6 percent.

The percentage of households lacking complete plumbing facilities also fell over the decade, from 16.4 percent of all housing units to 13.8 percent. Households are considered to have incomplete plumbing facilities when they are missing piped hot and cold water, a flush toilet, or a bathtub or shower.

Unlike housing units with incomplete plumbing facilities, those with incomplete kitchen facilities made up a larger share of housing units in 2010 than in 2000. Kitchen facilities are considered incomplete when any of the following are missing from the unit: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator. Just over a fifth of housing units lacked complete kitchen facilities in 2010, up a percentage point from 2000.

Homeowners and renters were more likely to be cost-burdened in 2010 than they had been in 2000. Households are considered to be cost burdened when more than 30 percent of their income goes toward housing costs. In 2000, some 26.1 percent of mortgagors were cost-burdened, along with 8.8 percent of renters. By 2010, those shares had grown to 31.2 and 12.2

percent, respectively. Some 3,261 households were observed to be cost-burdened in that year. This increased incidence of cost-burdening came in spite of a marked drop in housing costs after 2000.

Review of Fair Housing Laws, Studies, and Cases

Residents of the Northern Mariana Islands are protected from discrimination in the housing market by Federal and Commonwealth laws. The Federal Fair Housing Act provides the foundation for fair housing enforcement throughout the United States and its insular areas, prohibiting discrimination in a wide range of housing transactions on the basis of race, color, religion, national origin, sex, familial status, and disability. The CNMI also prohibits discrimination on these same bases in the Commonwealth Fair Housing Law, as well as discrimination on the basis of marital status.

Housing choice in the Northern Mariana Islands is also shaped by Article XII of the Commonwealth Constitution. This article, passed in recognition of “the importance of the ownership of land for the culture and tradition of the people of the Northern Mariana Islands⁴”, as well as to prevent their exploitation and promote their economic self-sufficiency, prohibits any resident without Carolinian or Chamorro ancestry from owning a long-term interest in real property on the islands. The restrictions of this article were considerably relaxed with the adoption of House Legislative Initiative in 2014: Prior to this initiative, only those who were at least one-quarter Chamorro or Carolinian were eligible to own land. At present, prospective land-owners must possess “some degree” of Chamorro or Carolinian blood.

In addition, Public Law 15-20, passed in 2006, made it possible for residents who are not of Northern Marianas descent to purchase long-term interest in housing units, provided that they are condominium units located above the ground floor.

Housing law and jurisprudence has evolved considerably since the FHA was first enacted in 1968. The Fair Housing Amendments Act of 1988 added additional protections, strengthened the Act’s relatively weak enforcement provisions, and gave the Department of Housing and Urban Development enhanced authority to enforce the Act. In addition, since the early 1970s the FHA has consistently been interpreted to apply to laws and policies that are apparently neutral with respect to protected class status, but which nevertheless “actually or predictably⁵” result in discrimination. In 2013, HUD finalized a rule formalizing its interpretation of discriminatory effects liability under the FHA.

That interpretation was reaffirmed in a June 25, 2015 Supreme Court decision in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.* That case originated in a lawsuit against the Texas Department of Housing and Community Affairs (“the Department”) on the grounds that the process by which it awarded low income housing tax credits had the effect of concentrating affordable housing in areas with high concentrations of minority residents. In bringing the suit, the Inclusive Communities Project relied in part on the disparate impact theory, and it was that theory that the Department sought to challenge in asking the Supreme Court to hear the case. Ultimately, the Court held that individuals,

⁴ See *N.M.I. Const. art. XII* and House Legislative Initiative 18-1 (2014)

⁵ *United States v. City of Black Jack, Missouri*, 508 F.2d 1179, 1184 (8th Cir. 1974) It was racial discrimination, specifically, that was at issue in this case.

businesses, and government agencies could be held liable for the disparate impacts of their policies.

Following on the heels of the Supreme Court decision, HUD announced a final rule significantly revamping its long-standing requirement to affirmatively further fair housing (AFFH). In developing and finalizing this rule, HUD has substantially revised the AFFH process by (1) replacing the analysis of impediments with the assessment of fair housing (AFH), (2) integrating fair housing planning into the consolidated planning process, and (3) providing a fair housing assessment tool and nationally standardized datasets, among other changes. Generally speaking, the new rule will apply to local entitlement jurisdictions that are due to begin their next five-year planning cycle in 2017 or later. For smaller entitlement jurisdictions, as well as states and insular areas, the new rule will apply to those set to begin their next planning cycle in 2018 or later. Until jurisdictions are required to submit an AFH, they are required to continue submitting analyses of impediments.

Under certain circumstances, the United States Department of Justice (DOJ) will file a fair housing complaint on behalf of residents who are suspected to have suffered a violation of fair housing law. No such complaints have been filed against housing providers, individuals, or officials in the Commonwealth in at least the last ten years.

Fair Housing Structure

Northern Mariana Islands residents who believe that they have experienced discrimination on the basis of race, color, religion, national origin, sex, disability, or familial status may file a complaint with the U.S. Department of Housing and Urban Development. Once a complaint has been filed, HUD will notify the party that has been accused of discrimination, and begin investigation of the complaint. At the same time, HUD will encourage the parties to resolve the complaint through informal conciliation. If the parties are unable to reach a conciliation agreement, HUD will issue the results of its investigation. If the agency has not found sufficient reason to believe that discrimination has occurred, it will close the investigation⁶. If HUD finds reasonable cause to believe that discrimination has occurred or is about to occur, the parties involved may choose to resolve the complaint through an administrative hearing, or may elect to go before a judge. Those found guilty of housing discrimination may have to pay fines and monetary damages, as well as mandatory fair housing training, adoption of a fair housing policy, and other measures.

In addition to its direct role in fair housing enforcement, HUD also promotes local fair housing outreach, education, investigation, and enforcement through partnerships with local agencies and organizations. Through the Fair Housing Assistance Program (FHAP), HUD offers technical and monetary assistance to government agencies that effectively enforce local fair housing laws, provided that those laws provide at least the same level of protection as the Federal Fair Housing Act ("Federal FHA").

The Commonwealth Fair Housing Act was created in part to allow the Northern Marianas Housing Corporation to assume responsibility for fair housing enforcement; however, at present the Housing Corporation is not a participant in the FHAP. However, the Housing

⁶ HUD also closes the investigation if the parties reach a successful conciliation agreement.

Corporation will accept complaints from Commonwealth residents who believe that they have experienced discrimination on any of the bases included in the Federal FHA, as well as those who may have experienced discrimination based on their marital status.

HUD also provides funding to local nonprofit organizations that conduct fair housing outreach, education, or investigation through the Fair Housing Initiatives Program (FHIP). There are currently no FHIP participants operating in the Northern Mariana Islands.

Fair Housing in the Private Sector

Housing choice is affected by a number of private-sector factors, including small business investment, attitudes and practices among housing providers, and trends in the rental housing market, home lending, and housing construction, among others.

The 2015 AI included a review of data gathered under the Community Reinvestment Act (CRA). According to those data, some 1,940 small business loans were issued in the CNMI from 2000 through 2014. Over 98 percent of these loans were issued on Saipan, totaling more than \$102 million. Census tracts along the western coast of Saipan tended to receive the most loans and loan dollars, though relatively few small business loans went to Census tracts in and around Chalan Kanoa, Chalan Piao, and San Antonio.

As noted previously, the U.S. Department of Housing and Urban Development accepts fair housing complaints from residents who believe that they have been subjected to unlawful discrimination in the housing market, as does the Corporate Director of the Northern Marianas Housing Corporation. However, neither agency has received any fair housing complaints since at least 2008.

Respondents to the 2015 Fair Housing Survey were generally unaware of any questionable practices or barrier to fair housing choice: fewer than ten percent of respondents noted that they were aware of questionable practices or barriers to fair housing choice in any of the private sector industries or areas mentioned. A majority of respondents answered “don’t know” in response to each question.

Fair Housing in the Public Sector

The ability of CNMI residents to choose where they live and obtain housing is affected by policies and practices in the public sector. The 2015 AI effort included a review several factors, including the location of assisted housing units, the 2013 Saipan Zoning Law, and public awareness of fair housing issues in land use and zoning policy, accessible design standards, the provision of public services, and other areas.

The U.S. Department of Housing and Urban Development provides rental assistance low-income residents of the CNMI through the Housing Choice Voucher program. This program, which is administered locally by the Northern Marianas Housing Corporation, makes portable housing subsidies available to qualified residents, allowing them to choose housing in any location where the landlord accepts the subsidy. There are currently around three-hundred housing choice vouchers in use throughout the commonwealth. Most of these are on Saipan,

the most populous island, and they are generally more highly concentrated in the more populous areas of the island.

Analysis of the public sector in the context of fair housing also included a review of the Saipan Zoning Law of 2013. This analysis did not reveal notable, overt barriers to fair housing choice; however, some elements were missing that might serve to promote broader access to housing. For example, conditional-use permits are required for institutional use permits, a classification which includes group homes and other types of supportive housing.

As was the case with the private sector portion of the 2015 Fair Housing Survey, those who responded to questions concerning the public sector were generally unaware of any questionable practices or barriers to fair housing choice in any public sector policies or practices. Limitations in access to government services was the most salient challenge from a fair housing perspective, but even those who were aware of fair housing issues in this area accounted for a small minority of survey respondents at 6.5 percent. Three of the seven who went on to identify specific issues relating to limitations in government services cited a lack of public transportation. More than seventy percent of respondents answered each question in this section with “don’t know.”

Public Involvement

During the 2015 AI process, the Commonwealth encouraged participation in fair housing planning through the 2015 Fair Housing Survey and a public meeting, held in November of 2015, in which findings from the AI were presented to stakeholders and citizens.

The 2015 Fair Housing Survey, along with efforts to disseminate and promote participation in the survey, constituted a large part of the public involvement efforts during the AI process. Respondents to the survey included service providers, advocates/service providers, construction and development professionals, local government officials, real estate professionals, and others. Nearly two-thirds of survey respondents were renters, and a clear majority considered themselves to be unfamiliar with fair housing laws.

However, nearly half of survey respondents considered fair housing laws to be useful, though around 18 percent felt that those laws are difficult to understand or follow. There was limited support for extending additional fair housing protections, with some respondents citing a need for protections for non-native residents or workers, and others identifying a need to protect local residents in fair housing laws. Around 41 percent felt that fair housing laws are not adequately enforced, and only 11 percent of respondents felt that they were adequately enforced.

Few respondents, or around eleven percent, were aware of any existing fair housing training process, and fewer still had participated in such training. There was broad agreement that current fair housing outreach and education activity was insufficient, and few respondents were aware of any fair housing testing in the Commonwealth.

No more than 17.6 percent of respondents were able to correctly identify groups protected under the Federal or Commonwealth Fair Housing Act: this percentage of respondents correctly identified “religion” as a protected class, and a similar share identified “national

origin.” However, a similar share also identified “income” as a protected class, which is not protected under Federal or commonwealth fair housing laws. In addition, more than a fifth of respondents cited “age” as a protected class, which is not protected under general fair housing provisions at the Federal or local level. Fewer than five percent of respondents were aware of any local fair housing ordinance, regulation, or plan.

A formal presentation of findings from the 2015 AI process is scheduled for November of 2015. The content of the meeting and any subsequent discussions or additional information will be included in the final report.

IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

Private Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: People who are not of Northern Marianas Descent (NMD), and who are subject to legal restrictions on their ability to own land, tend to be concentrated in areas with high shares of rental housing. This impediment was identified through review of Article XII of the Commonwealth Constitution, as well as through geographic analyses of the Commonwealth population and housing stock.

Action 1.1: Seek avenues to promote a greater balance of owner- and renter-occupied housing throughout the Commonwealth, including policies to encourage the development of rental housing in areas currently dominated by owner-occupied housing.

Measurable Objective 1.1: The identification of methods to promote a greater balance of renter- and owner-occupied housing.

Action 1.2: In future housing development, promote the development of multi-story owner-occupied condominium units that allow for ownership by non-NMD residents in areas with high concentrations of single-family, owner-occupied housing.

Measurable Objective 1.2: Measures taken to promote multi-story condominium development in areas with high concentrations of owner-occupied housing.

Impediment 2: Lack of fair housing complaint activity. This impediment was identified in correspondence with representatives from HUD and the Northern Marianas Housing Corporation, as well as in the lack of housing complaints that either agency has received from Commonwealth residents.

Action 2.1: Conduct outreach and education activities to promote awareness of fair housing laws and the legal remedies available to those who believe that they have experienced discrimination in the housing market.

Measurable Objective 2.1: The number of outreach and education activities conducted and the number of participants in those activities.

Impediment 3: Need to create legal avenues available to Commonwealth residents who believe that they have experienced housing discrimination. This impediment was identified in the lack of fair housing complaint data and through review of the Northern Marianas fair housing infrastructure.

Action 1.1: Explore possibilities for public-private partnerships, with local legal system, to provide fair housing services including outreach, education, and enforcement.

Measurable Objective 1.1: The identification of potential partners, an assessment of the types of services that these partnerships could offer, and the establishment of any partnerships focusing on fair housing issues.

Public Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: Need to strengthen the local fair housing infrastructure. This impediment was identified through review of the fair housing agencies and organizations serving commonwealth residents, contact with the U.S. Department of Housing and Urban Development, and results of the 2015 Fair Housing Survey.

Action 1.1: Name a fair housing officer who, operating under the authority granted the Corporate Director of the Northern Marianas Housing Corporation by the Commonwealth Fair Housing Act, will accept housing discrimination complaints for investigation and enforcement.

Measurable Objective 1.1: The naming, or creation and filling, of the position of fair housing officer.

Action 1.2: Publicize the responsibilities of the Fair Housing Officer in print and online media, including the Housing Corporation website.

Measurable Objective 1.2: Publication materials relating to the fair housing officer, and the number and type of media outlets in which the position is publicized.

Action 1.3: Task the fair housing officer with conducting or promoting fair housing outreach, education, and training activities in the Commonwealth.

Measurable Objective 1.3: The number of outreach and education activities conducted under the auspices of the Fair Housing Office, the number of participants in those activities, and the level of resources dedicated to fair housing outreach and education.

Impediment 2: Lack of knowledge of fair housing rights and obligations on the part of housing providers and consumers. This impediment was identified through review of responses to the 2015 Fair Housing Survey.

Action 2.1: Conduct fair housing outreach and education targeting rental tenants, providing an overview of fair housing laws and examples of discrimination that housing consumers may encounter in the rental housing market.

Measurable Objective 2.1: The number of fair housing outreach and education activities conducted, and the number of participants in those activities.

Action 2.2: Include a discussion of the Commonwealth Fair Housing Act on the Housing Corporation's Fair Housing webpage, and update hyperlinks to fair housing complaint forms.

Measurable Objective 2.2: The inclusion of additional narrative on the Housing Corporation's Fair Housing webpage and updated hyperlinks.

Impediment 3: Lack of Northern Marianas Housing Corporation certification as “substantially equivalent” for the purposes of the Fair Housing Assistance Program (FHAP). This impediment was identified through review of the Northern Marianas fair housing infrastructure.

Action 3.1: In year three of the Five-Year AI Action Plan, direct the Fair Housing Officer to compile data concerning fair housing complaint processing and enforcement activities that the Office has conducted in the first two years of the Action Plan period and present those data to HUD as part of an application for substantially equivalent status.

Measurable Objective 3.1: Data gathered for submission to HUD, submittal of the data, and HUD’s response.

SECTION I. INTRODUCTION

Title VIII of the 1968 Civil Rights Act, also known as the Federal Fair Housing Act, made it illegal to discriminate in the buying, selling, or renting of housing based on a person's race, color, religion, or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected classes. Federal fair housing statutes are largely covered by the following three pieces of U.S. legislation:

1. The Fair Housing Act,
2. The Housing Amendments Act, and
3. The Americans with Disabilities Act.

The purpose of fair housing law is to protect a person's right to own, sell, purchase, or rent housing of his or her choice without fear of unlawful discrimination. The goal of fair housing law is to allow everyone equal access to housing.

WHY ASSESS FAIR HOUSING?

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(e) (5) of the Federal Fair Housing Act, which requires that the Secretary of HUD administer Federal housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grants (ESG)⁷, and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle.

As a part of the consolidated planning process, states, entitlement communities, and insular areas that receive such funds as a formula allocation directly from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing. This certification includes the following three elements:

1. Complete an Analysis of Impediments to Fair Housing Choice (AI),
2. Take actions to overcome the effects of any impediments identified through the analysis, and
3. Maintain records reflecting the analysis and actions taken.

In the *Fair Housing Planning Guide*, page 2-8, HUD notes that impediments to fair housing choice are:

⁷ In 1994, the Emergency Solutions Grants program was called the Emergency Shelters Grants program.

- “Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices [and]
- Any actions, omissions, or decisions which have [this] effect.”⁸

State, county, insular, or local governments may enact fair housing laws that extend protection to other groups as well. Accordingly, the Commonwealth Fair Housing Act, which prohibits discrimination on all of the bases included in the fair housing act, also prohibits discrimination based on marital status.⁹

Table I.1
Comparison of Fair Housing Laws
The Northern Mariana Islands

Protected Group	Federal Fair Housing Act	Commonwealth Fair Housing Act
Race	X	X
Color	X	X
Religion	X	X
National Origin	X	X
Sex	X	X
Disability	X	X
Familial Status	X	X
Marital Status		X

It is essential to distinguish between fair housing and housing production. As discussed above, fair housing protections at the Federal level do not include consideration of income and do not address housing affordability outside the context of housing discrimination. While lack of affordable housing can be a significant concern to policymakers, it is not, on its own, a fair housing problem unless members of protected classes face this issue disproportionately.

PURPOSE OF THIS RESEARCH

HUD interprets the broad objectives of affirmatively furthering fair housing to include:

- “Analyzing and working to eliminate housing discrimination in the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to, and usable by, all persons, particularly individuals with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.”¹⁰

The objective of the 2015 AI process was to research, analyze, and identify prospective impediments to fair housing choice throughout the Commonwealth. The goal of the completed AI is to suggest actions that the Commonwealth can consider when working toward eliminating or mitigating the identified impediments.

⁸ *Fair Housing Planning Guide*.

⁹ 2 CMC §40101 et seq

¹⁰ *Fair Housing Planning Guide*, p.1-3.

LEAD AGENCY

The agency that led the effort of preparing this report on behalf of the Commonwealth of the Northern Mariana Islands was Northern Marianas Housing Corporation.

Commitment to Fair Housing

In accordance with the applicable statutes and regulations governing the Consolidated Plan, the Commonwealth certifies that it will *affirmatively further fair housing*. This statement means that it has conducted an AI, will take appropriate actions to overcome the effects of any impediments identified through that analysis, and will maintain records that reflect the analysis and actions taken in this regard.

GEOGRAPHIC SCOPE OF THE ANALYSIS

This AI addresses the status of fair housing within the Commonwealth of the Northern Mariana Islands. Map I.1, on the following page, displays the CNMI study area, which includes the three permanently populated islands of Saipan, Tinian, and Rota. Maps used throughout the document follow the same format used in this map, which provides an overview and detailed insets of the three islands.

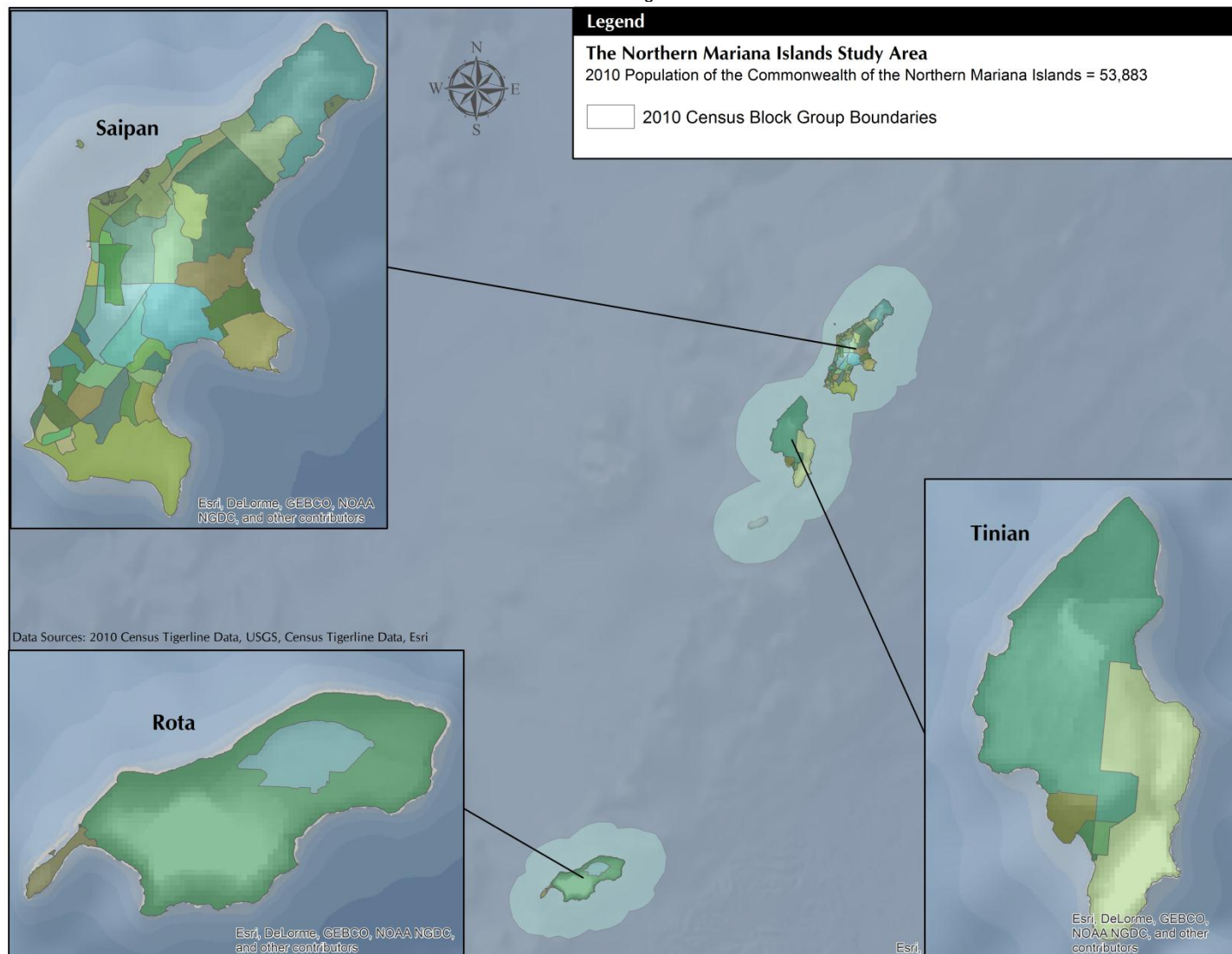
RESEARCH METHODOLOGY

The AI process involves a thorough examination of a variety of data related to housing, particularly for persons who are protected under fair housing laws. AI sources include Census data, employment and income information, business lending data, fair housing complaint information, surveys of housing industry experts and stakeholders, and related information found in the public domain. Relevant information was collected and evaluated via four general approaches:

1. *Primary Research*, or the collection and analysis of raw data that did not previously exist;
2. *Secondary Research*, or the review of existing data and studies;
3. *Quantitative Analysis*, or the evaluation of objective, measurable, and numerical data; and
4. *Qualitative Analysis*, or the evaluation and assessment of subjective data such as individuals' beliefs, feelings, attitudes, opinions, and experiences.

Some baseline secondary and quantitative data were drawn from the Census Bureau, including 2000 and 2010 Census counts. Data from these sources detail population, personal income, poverty, housing units by tenure, cost burdens, and housing conditions. The following narrative offers a brief description of other key data sources employed in the 2015 AI for the Commonwealth of the Northern Mariana Islands.

Map I.1
Northern Mariana Islands Study Area
 The Northern Mariana Islands
 2010 Census Tigerline Data



Fair Housing Complaint Data

In an effort to evaluate the extent and types of discriminatory practices present in the commonwealth housing market, HUD was contacted with a request for fair housing complaint data from the period of 2008 to the present. However, HUD reported that they had received no fair housing complaints from commonwealth residents during that time period. Similarly, the Northern Marianas Housing Corporation, whose Corporate Director is authorized to enforce the Commonwealth Fair Housing Act, had not received any fair housing complaints as of the writing of this report.

Fair Housing Survey

HUD recommends that surveys be conducted during the AI process to gain input for the public regarding perceived impediments to fair housing choice in an area. As such, the CNMI elected to utilize a survey instrument as a means to encourage public input in the AI process. The survey targeted professionals and policy-makers in the housing arena, as well as residents of the CNMI in general. In addition to gathering data, this survey was utilized to help promote public involvement throughout the AI process. The 2015 Commonwealth of the Northern Mariana Islands Fair Housing Survey, which was available in internet-based on paper versions, received 209 responses.

The survey was designed to address a wide variety of issues related to fair housing and affirmatively furthering fair housing. If limited input on a particular topic was received, it was assumed that the entirety of stakeholders did not view the issue as one of high pervasiveness or impact. This does not mean that the issue was nonexistent in the Commonwealth, but rather that there was no widespread perception of its prevalence, as gauged by survey participants. The following narrative summarizes key survey themes and data that were addressed in the survey instrument.

Federal and Local Fair Housing Laws

The first section of the survey asked respondents to address a number of questions related to fair housing laws, assessing their familiarity with and understanding of these laws, knowledge of classes of persons protected by these laws, and opinions on whether or not fair housing laws should be changed, among other topics.

Fair Housing Activities

The second section of the survey evaluated stakeholders' awareness of and participation in fair housing activities in the CNMI, including outreach activities such as trainings and seminars, as well as monitoring and enforcement activities such as fair housing testing exercises.

Barriers to Fair Housing Choice in the Private Sector

This section addressed fair housing in the private housing sector and offered a series of two-part questions. The first part asked respondents to indicate awareness of questionable practices or barriers to fair housing choice in a variety of industries, and the second part requested a narrative description of these questionable practices or concerns if an affirmative response was

received. The specific areas of the private sector that respondents were asked to examine included the following:

- Rental housing market,
- Real estate industry,
- Mortgage and home lending industries,
- Housing construction or accessible housing design fields,
- Home insurance industry,
- Home appraisal industry, and
- Any other housing services.

The use of open-ended questions allowed respondents to address any number of concerns such as redlining, neighborhood issues, lease provisions, steering, substandard rental housing, occupancy rules, and other fair housing issues in the private housing sector.

Fair Housing in the Public Sector

Just as in the section of the survey concerning private sector barriers, respondents were asked to offer insight into their awareness of questionable practices or barriers to fair housing in the public sector. A list of areas within the public sector was provided, and respondents were asked first to specify their awareness of fair housing issues within each area. If they were aware of any fair housing issues, they were asked to provide comments further describing these issues. Respondents were asked to identify fair housing issues within the following public sector areas related to housing:

- Land use policies,
- Zoning laws,
- Occupancy standards or health and safety codes,
- Property tax policies,
- Permitting processes,
- Housing construction standards,
- Neighborhood or community development policies, and
- Any other public administrative actions or regulations.

The questions in this section were used to identify fair housing issues in the Commonwealth regarding zoning, building codes, accessibility compliance, subdivision regulations, displacement issues, development practices, residency requirements, property tax policies, land use policies, and NIMBYism.¹¹

Additional Questions

Finally, respondents were asked about their awareness of any local fair housing plans or specific geographic areas with fair housing problems. Respondents were also asked to leave additional comments.

¹¹“Not In My Backyard” mentality

Research Conclusions

The final list of impediments to fair housing choice for the Commonwealth of the Northern Mariana Islands was drawn from all quantitative, qualitative, and public input sources, and was based on HUD's definition of an impediment to fair housing choice as any action, omission, or decision that affects housing choice because of protected class status. The determination of qualification as an impediment was derived from the frequency and severity of occurrences drawn from quantitative and qualitative data evaluation and findings.

PUBLIC INVOLVEMENT

This section discusses analysis of fair housing in the Commonwealth of the Northern Mariana Islands as gathered from various public involvement efforts conducted as part of the AI process. Public involvement feedback is a valuable source of qualitative data about impediments, but, as with any data source, citizen comments alone do not necessarily demonstrate the existence of widespread impediments to fair housing choice. However, survey and forum comments that support findings from other qualitative parts of the analysis often reinforce findings from quantitative data sources concerning impediments to fair housing choice.

SECTION II. SOCIO-ECONOMIC CONTEXT

This section presents demographic, economic, and housing information collected from the Census Bureau. Data were used to analyze a broad range of socio-economic characteristics, including population growth, race, ethnicity, disability, employment, poverty, and housing trends. The information presented in this section illustrates the underlying conditions that shape housing market behavior and housing choice in the Northern Mariana Islands. For clarity the narrative and tables included in this section largely focus on trends in the Commonwealth as a whole. However, the narrative also compares general patterns to individual island-level trends, and tables detailing those trends are included in Appendix A. Table references in the following section that begin with “A” refer to tables in Appendix A.

DEMOGRAPHICS

As part of the essential review of the background context of the markets which housing choices are made in the Northern Mariana Islands, detailed population and demographic data are included to describe the residents of these areas. These data summarize the characteristics of the total population for the Commonwealth, as well as the outcome of housing location choices. These data help to address whether over-concentrations of racial and ethnic minorities exist, and if so, which areas of the Commonwealth are most affected.

POPULATION BY AGE

The population of the Northern Mariana Islands stood at 69,221 in 2000, as shown in Table II.1 below. A majority of the population in that year was aged 25 to 54 years, with residents aged 25 to 34 accounting for the largest share of the population, at 29.2 percent. The population as a whole fell by 22.2 percent over the decade due to a sharp decline in the number of residents aged 20 to 34, and a more moderate decline among children aged less than five years. As a result, the composition of the population by age shifted markedly over the decade as the share of residents aged 5 to 19 rose from around 20 percent to over a quarter of the population and the share of residents aged 35 to 54 grew by nearly ten percentage points. These two groups represented 62.6 percent of the population in 2010.

Table II.1
Population by Age
Northern Mariana Islands
2000 & 2010 Census

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	5,792	8.4%	4,827	9.0%	-16.7%
5 to 19	13,740	19.8%	13,784	25.6%	0.3%
20 to 24	7,566	10.9%	2,670	5.0%	-64.7%
25 to 34	20,181	29.2%	6,925	12.9%	-65.7%
35 to 54	18,859	27.2%	19,955	37.0%	5.8%
55 to 64	2,036	2.9%	4,156	7.7%	104.1%
65 or Older	1,047	1.5%	1,566	2.9%	49.6%
Total	69,221	100.0%	53,883	100.0%	-22.2%

Trends in the population by age on Saipan, Tinian, and Rota reflected those overall trends, though there were some variations in island-level population trends. For example, Tinian experienced declines in all age cohorts except those including residents aged 35 to 64, as shown in Table A.1.B. Similarly, Rota saw population declines in residents from all cohorts aged less than 55 years, as shown in Table A.1.C. Data from Saipan are presented in Table A.1.A in Appendix A.

Unlike the population as a whole, the population of residents aged 65 years or older grew by 49.6 percent across the Commonwealth. As shown in Table II.2 below, most of the age cohorts within this elderly population grew at a faster-than-average rate over the decade. However, this was not true of residents aged 67 to 69 or those aged 85 or older: the former grew by 34.9 percent over the decade, slower than the overall average, while the latter declined in number by 13.6 percent.

Table II.2
Elderly Population by Age
Northern Mariana Islands
2000 & 2010 Census

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	205	19.6%	320	20.4%	56.1%
67 to 69	281	26.8%	379	24.2%	34.9%
70 to 74	262	25.0%	440	28.1%	67.9%
75 to 79	153	14.6%	250	16.0%	63.4%
80 to 84	80	7.6%	120	7.7%	50.0%
85 or Older	66	6.3%	57	3.6%	-13.6%
Total	1,047	100.0%	1,566	100.0%	49.6%

Population trends among elderly residents on each island differed in some respects from trends at the commonwealth level: as shown in Table A.2.A, changes to the elderly population on Saipan were similar to changes in the population as a whole, though the elderly population of Saipan grew at a faster rate, or 57.9 percent. Elderly residents represented a larger share of the populations of Tinian and Rota, though the elderly populations of each island were relatively small in absolute terms. Population trends among elderly residents on Tinian and Rota are presented in Tables A.2.B and A.2.C, respectively. Again, these tables are located in Appendix A.

GROUP QUARTERS POPULATION

More than a quarter of the Commonwealth population was living in group quarters in 2000, as shown in Table II.3 on the following page. Nearly all of these 17,791 residents lived in “other non-institutional” settings, which include worker dormitories. The group quarters population fell by over 92 percent between 2000 and 2010, by which time there were only 1,571 residents living in group quarters. Though the group quarters populations also declined on Tinian and Rota, the vast majority of these residents lived on Saipan in 2000. Tables A.3.A, A.3.B, and A.3.C highlight group quarters trends in Saipan, Tinian, and Rota, respectively.

It is likely that many, if not most, of the group quarters residents in 2000 were workers in Saipan's textile industry, which declined considerably after 2000¹². Excluding these residents, many of whom were migrant workers from China and other Asian countries¹³, from population figures suggest that the population of the Commonwealth that was living in households actually increased between 2000 and 2010, from 51,430 to 52,312.

Table II.3
Group Quarters Population
Northern Mariana Islands
2000 & 2010 Census Data

2000 & 2010 Census Data					
Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	84	91.3%	125	94.0%	48.8%
Juvenile Facilities	0	0.0%	7	5.3%	
Nursing Homes	0	0.0%	0	0.0%	0.0%
Other Institutions	8	8.7%	1	0.8%	-87.5%
Total	92	100.0%	133	100.0%	44.6%
Noninstitutionalized					
College Dormitories	0	%	162	11.3%	
Military Quarters	0	.0%	0	.0%	
Other Non-institutional	17,699	%	1,276	88.7%	-92.8%
Total	0	.0%	1,438	91.5%	%
Group Quarters Population	17,791	100.0%	1,571	100.0%	-91.2%

POPULATION BY RACE AND ETHNICITY

Over 95 percent of commonwealth residents identified themselves as belonging to one ethnic origin or race. As shown in Table II.4 on the following page, a majority of that population identified themselves either as Asian or Native Hawaiian and Pacific Islander (NHPI), and residents from those groups accounted for 59.1 and 38.1 percent of the single-race/single-ethnicity (SRSE) population in 2000, respectively. The remainder of the population in that year consisted mostly of white residents, who accounted for 1.9 percent of the SRSE population, or multi-racial/ethnic residents ("MRE residents"), who represented 4.8 percent of the population.

One of the most notable changes in the population from 2000 to 2010 was the higher share of residents belonging to two racial/ethnic groups or more; as the number of SRSE residents fell by 28.6 percent over the decade, the MRE population more than doubled in size and as a share of the population. Population data from the 2010 Census were considerably more detailed than those gathered in 2000; with the two largest racial and ethnic group categories, or Asian and NHPI residents, broken down into specific racial and ethnic groups. A majority of NHPI residents in 2010, or 68.6 percent, were Chamorro, followed by the 13.1 percent who were Carolinian. A large majority, or 70.7 percent, of Asian commonwealth residents were of Filipino origin, though Chinese residents represented a relatively large share of the Commonwealth's Asian population at 13.6 percent.

¹² "Made in the U.S.A.? – Hard Labor on a Pacific Island/A special report.; Saipan Sweatshops are No American Dream." The New York Times. NYTimes.com. Accessed on October 28, 2015 from <http://www.nytimes.com/1993/07/18/world/made-usa-hard-labor-pacific-island-special-report-saipan-sweatshops-are-no.html?pagewanted=all>. The article notes that a large numbers of foreign workers live in "barracks".

¹³ *Ibid.*

As shown in Table A.4.A, these overall trends were largely mirrored on Saipan, which held most of the commonwealth population in both years. By contrast, Chamorro residents represented fully 96.8 percent of the NHPI population of Tinian, while Carolinian residents made up less than one percent. In other respects, the racial/ethnic composition of Tinian resembled the composition of the Commonwealth as a whole, though Chinese residents represented a larger share of the Asian population, which in turn accounted for a comparatively larger share of the SRSE population, as shown in Table A.4.B. Unlike Saipan or Tinian, Native Hawaiian or Pacific Islander residents represented a majority of the population of Rota; as shown in Table A.4.C, nearly 96 percent of these NHPI residents were Chamorro. In addition, the Chinese population accounted for a relatively small share of Asian residents, while the share of Filipino residents, at 88.6 percent, was comparatively large.

Table II.4
Population by Race and Ethnicity
Northern Mariana Islands
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Population of One Ethnic Origin or Race:	65,888	95.2%	47,051	87.3%	-28.6%
Native Hawaiian and Other Pacific Islander	25,127	38.1%	18,800	40.0%	-25.2%
Carolinian	.	.	2,461	13.1%	.
Chamorro	.	.	12,902	68.6%	.
Chuukese	.	.	1,242	6.6%	.
Kosraean	.	.	37	0.2%	.
Marshallese	.	.	68	0.4%	.
Palauan	.	.	1,169	6.2%	.
Pohnpeian	.	.	425	2.3%	.
Yapese	.	.	228	1.2%	.
Other Pacific Islander	.	.	268	1.4%	.
Asian	38,953	59.1%	26,908	57.2%	-30.9%
Bangladeshi	.	.	501	1.9%	.
Chinese	.	.	3,659	13.6%	.
Filipino	.	.	19,017	70.7%	.
Japanese	.	.	795	3.0%	.
Korean	.	.	2,253	8.4%	.
Nepalese	.	.	227	0.8%	.
Thai	.	.	266	1.0%	.
Other Asian	.	.	190	0.7%	.
White	1,274	1.9%	1,117	2.4%	-12.3%
Black	43	0.1%	55	0.1%	27.9%
Hispanic	.	.	54	0.1%	.
Population of Two Ethnic Origins or Races:	3,333	4.8%	6,832	12.7%	105.0%
Total	69,221	100.0%	53,883	100.0%	-22.2%

The Asian population tended to be more highly concentrated in Census block groups on Saipan than on Tinian or Rota, particularly along the island's western coastline. As shown in Map II.1 on page 26, Asian residents of Saipan accounted for more than 69 percent of the SRE population in many Census tracts in that area, notably in or around American Memorial Park, Puerto Rico, and Lower Base, as well as in block groups on the southwestern corner of the island. On Tinian, the only block groups with above-average shares of Asian residents were located in San Jose, and there were no above-average or disproportionate shares of Asian residents on Rota.

By 2010, Asian residents had declined as a share of the Commonwealth SRE population from 59.1 to 57.2 percent. As shown in Map II.2 on page 27, the geographic distribution of the Asian population was similar in that year to its 2000 distribution; with relatively high concentrations of Asian residents appearing in Census block groups along the western coastline of Saipan. Additionally, Asian residents of Tinian continued to account for above-average, and even disproportionate, shares of the SRE population in block groups in and around San Jose. The Asian population still accounted for relatively small shares of the SRE population in block groups on Rota.

While Asian residents accounted for above-average shares of the SRE population of block groups on the western coastline of Saipan, residents of Hawaiian or Pacific Islander origin tended to be more highly concentrated in block groups throughout the rest of Saipan in 2000. As shown in Map II.3 on page 28, these residents accounted for the largest shares of the SRE population in block groups to the north of Puerto Rico on the west coast of the island, and in block groups near Laulau Bay, Kagman, Opyan, I Naftan, I Fadang, and Dandan on the eastern coast.

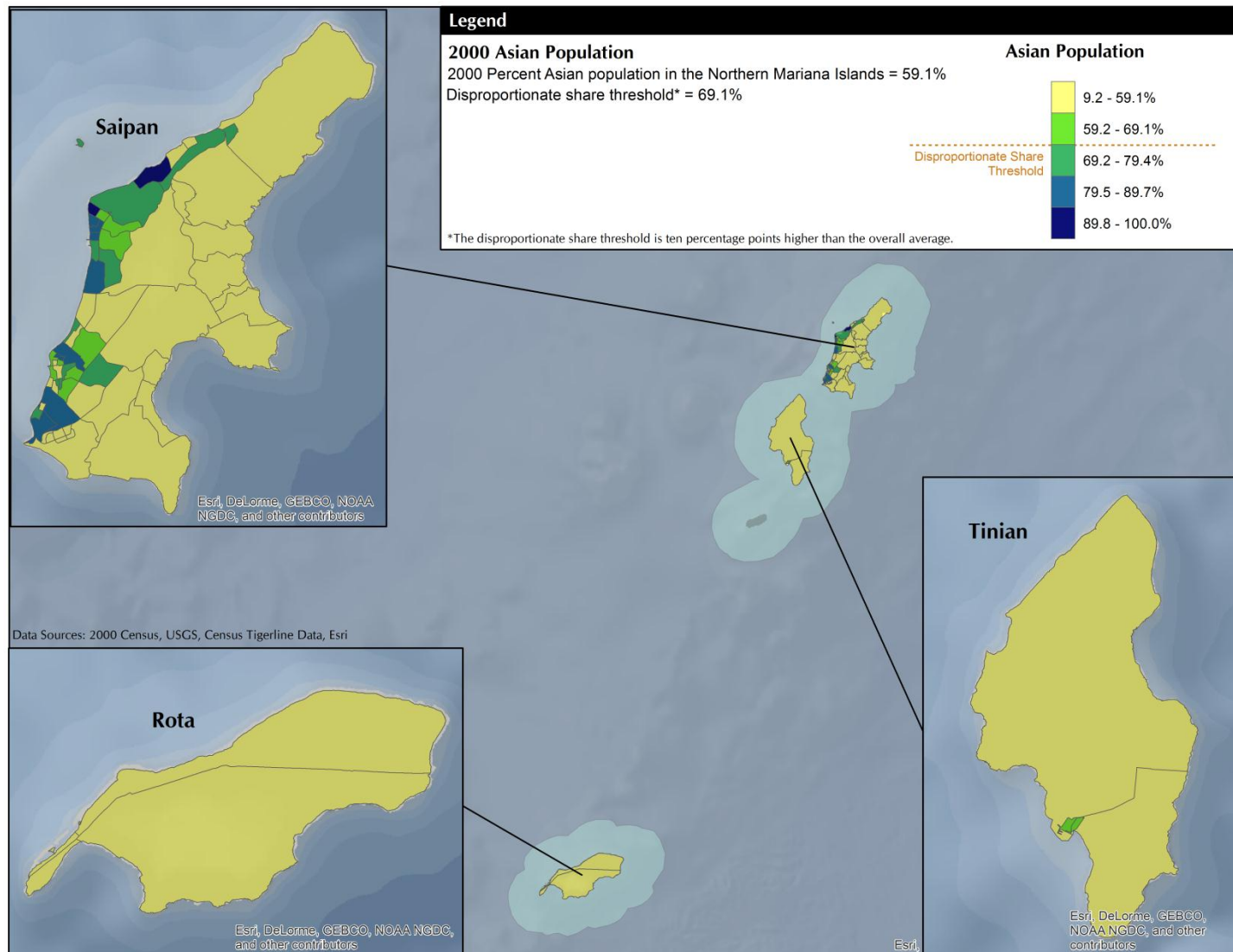
These same areas continued to hold disproportionate shares of Hawaiian or Pacific Islander residents in 2010, even as this population grew as a share of the total Commonwealth SRE population. As shown in Map II.4 on page 29, Hawaiian/Pacific Islander residents accounted for more than half of the SRE population in block groups along the eastern coast of Saipan, as well as at the extreme southern and northern points of the island, along with all block groups on the island of Rota. On Tinian, the Hawaiian/Pacific Islander population represented majorities of the SRE population outside of the center of San Jose. It is interesting to note that the Asian and NHPI populations tend to be somewhat segregated.

Residents who self-identified with two or more racial or ethnic groups (“multi-racial/ethnic”, or “MRE” residents) accounted for 4.8 percent of the total population in 2000. As shown in Map II.5 on page 30, there were few areas with disproportionate concentrations of residents from two or more racial or ethnic groups in that year. On Saipan, these residents tended to represent larger shares of the population of Census block groups along the east coast of the island, though there were a handful of block groups along the western coastline with above-average shares of multi-racial/ethnic residents. The highest concentrations of MRE residents appeared in San Jose, on Tinian, where nearly a fifth of the population identified themselves as belonging to two or more racial or ethnic groups.

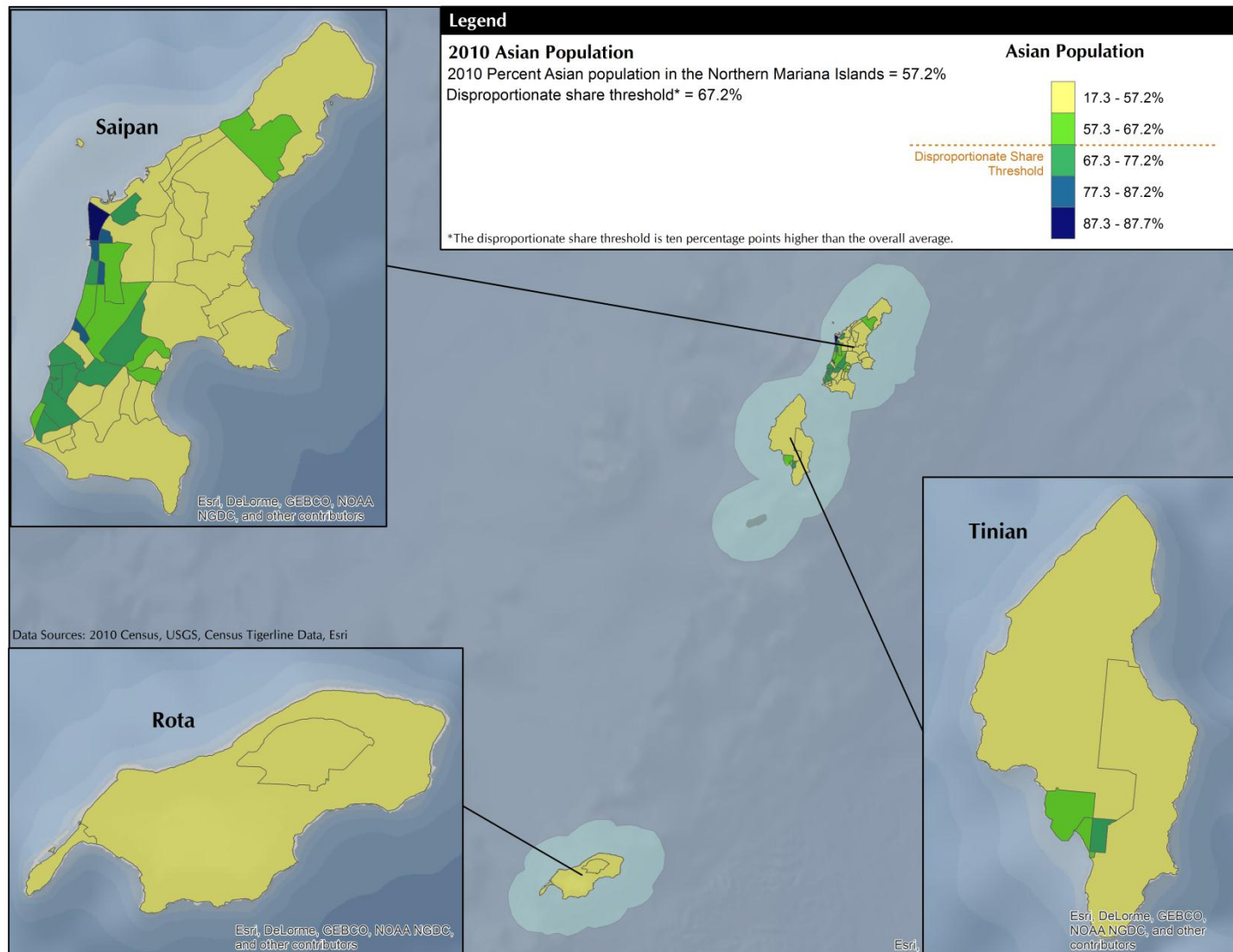
By 2010, the percentage of the overall population identifying as multi-racial/ethnic had more than doubled, accounting for 12.7 percent of all Commonwealth residents in that year. As this population grew, residents who identified with two or more races came to account for larger shares of the overall population in several block groups on the north of Saipan, as well as in Kagman III. In these areas, the share of MRE residents accounted for 22.8 to 27.6 percent of the population, as shown in Map II.6 on page 31.

Note that although there were few disproportionate concentrations of MRE residents in block groups throughout Tinian and Rota, this was largely due to the increasing overall share of residents identifying with two or more racial or ethnic groups and not to decreasing shares of MRE residents on those islands.

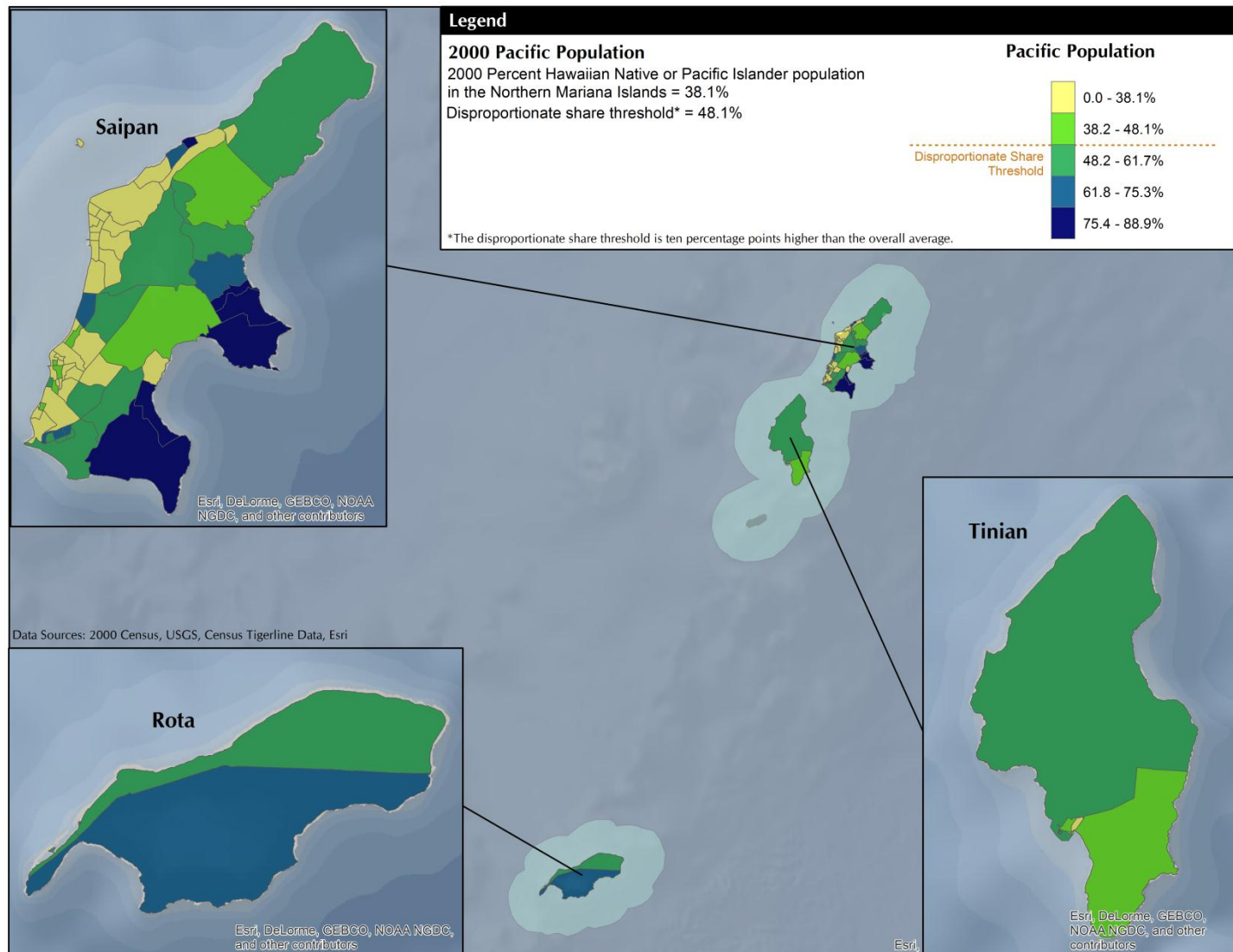
Map II.1
2000 Asian Population by Census Block Group
 The Northern Mariana Islands
 2000 Census Data



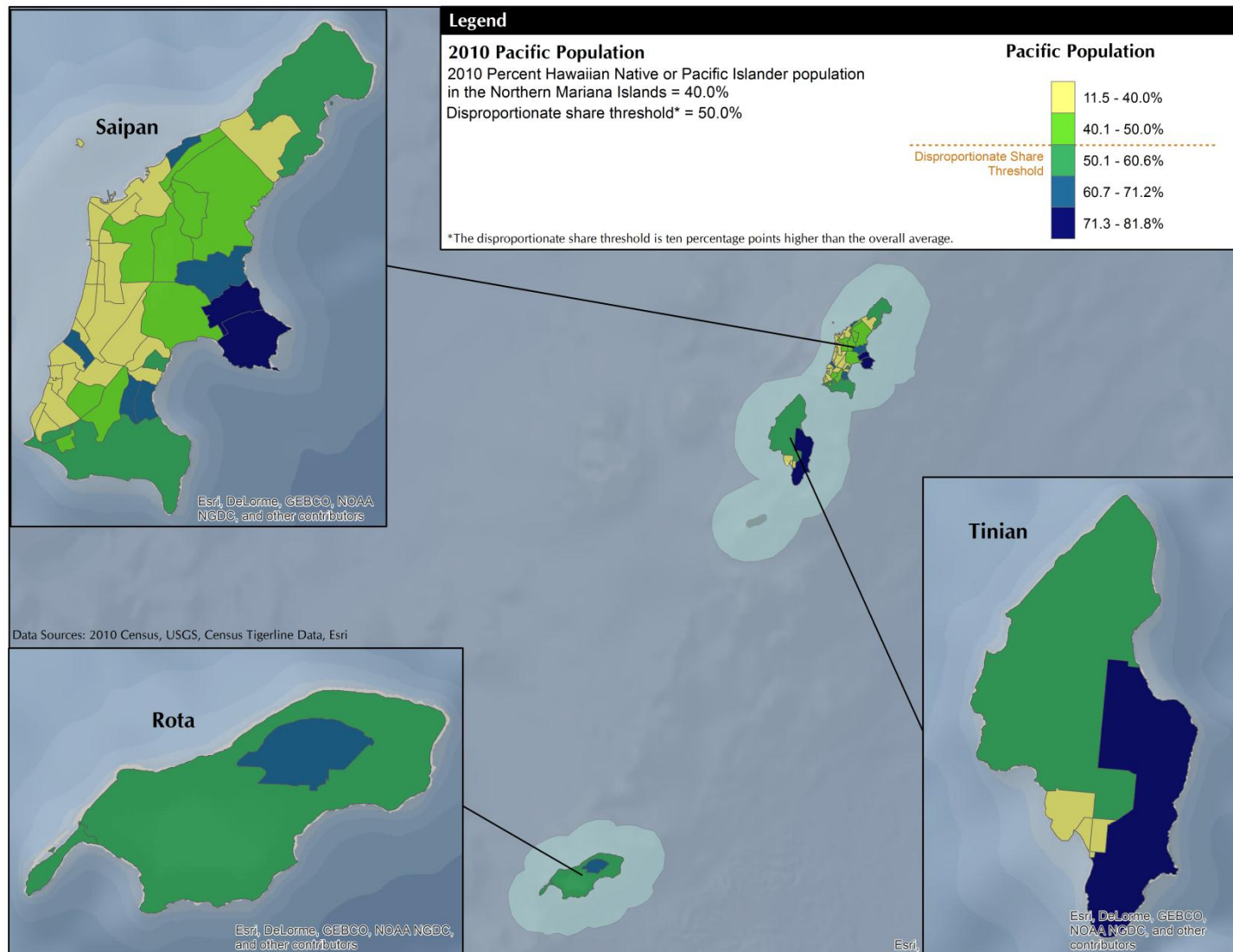
Map II.2
2010 Asian Population by Census Block Group
 The Northern Mariana Islands
 2010 Census Data



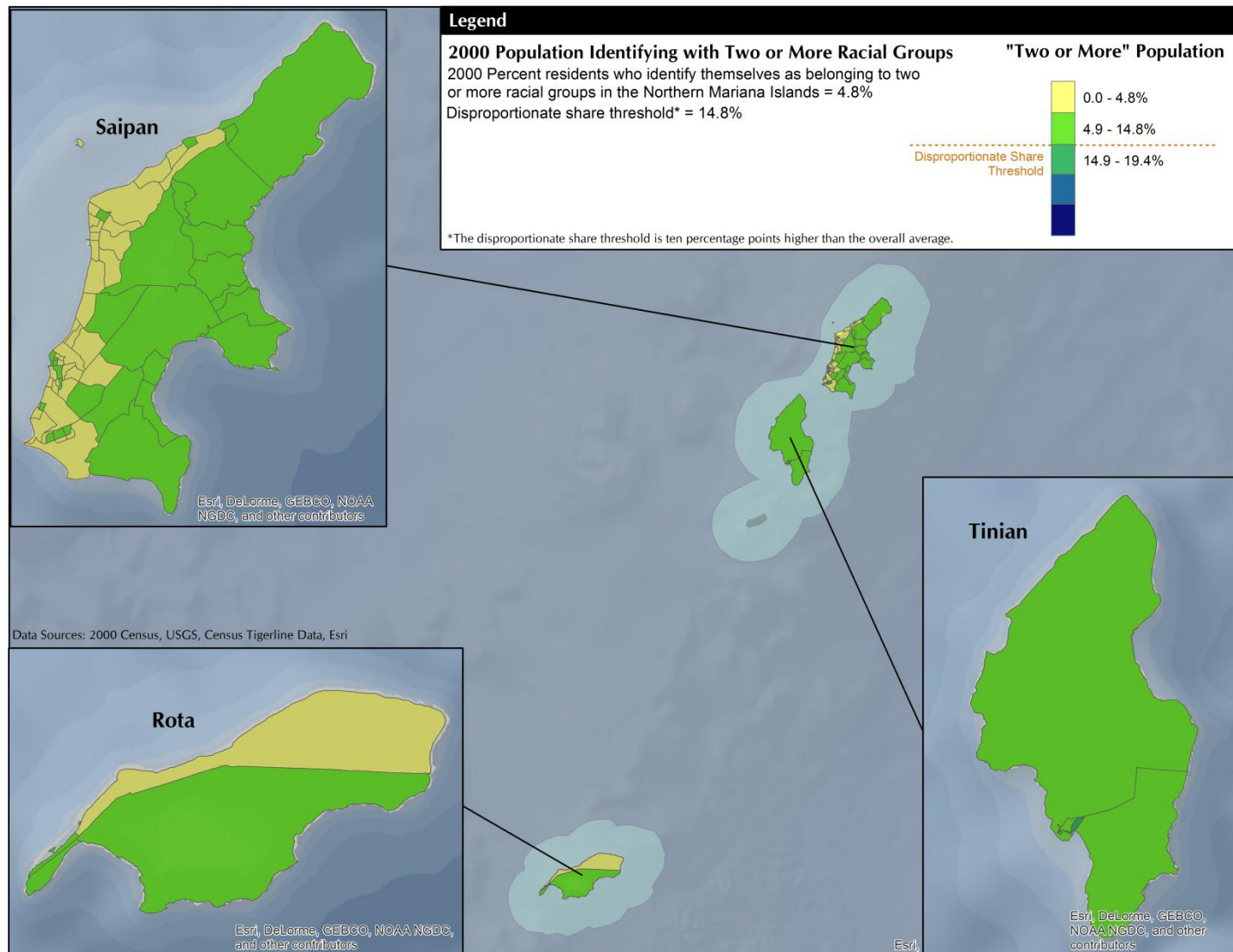
Map II.3
2000 Hawaiian/Pacific Islander Population by Census Block Group
 The Northern Mariana Islands
 2000 Census Data



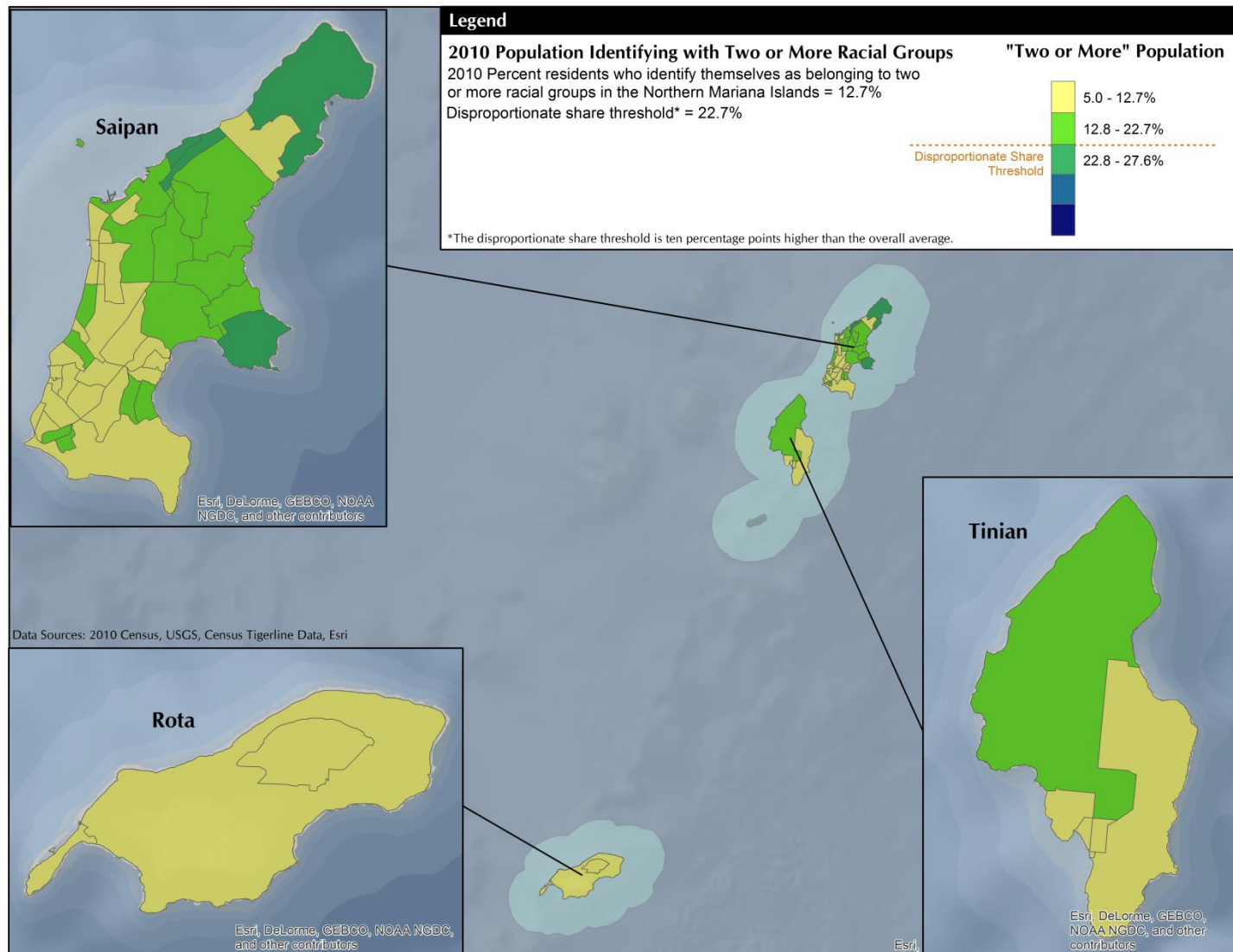
Map II.4
2010 Hawaiian/Pacific Islander Population by Census Block Group
 The Northern Mariana Islands
 2010 Census Data



Map II.5
2000 “Two or More” Population by Census Block Group
 The Northern Mariana Islands
 2000 Census Data



Map II.6
2010 “Two or More” Population by Census Block Group
 The Northern Mariana Islands
 2010 Census Data



DISABILITY STATUS

As shown in Table II.5 at right, residents with disabilities accounted for 14.3 percent of the commonwealth population in 2000. As one might expect, the incidence of disability rose with age, from 2.5 percent of residents aged 5 to 15 to 51.2 percent of residents aged 65 and older. The share of residents with disabilities in Saipan in 2000 was slightly higher than the commonwealth average, as shown in Table A.5.A. The same was true of Tinian, as shown in Table A.5.B. Residents with disabilities accounted for 9.8 percent of the population of Rota in 2000, as shown in Table A.5.C.

Table II.5
Disability by Age
Northern Mariana Islands
2000 Census

Age	Total	
	Residents w/ Disabilities	Disability Rate
5 to 15	252	2.5%
16 to 64	8,278	19.0%
65 and older	536	51.2%
Total	9,066	14.3%

Some 5.5 percent of the commonwealth population was living with some form of disability in 2010, as shown in Table II.6 below. In that same year, residents with disabilities accounted for 5.6 percent of the population of both Saipan, as shown in Table A.6.A, and Rota, as shown in Table A.6.C. Residents with disabilities accounted for a smaller share, or 3.7 percent, of the population of Tinian in 2010, as shown in Table A.6.B. It is important to note that the overall conception of disability employed in the 2010 Census was substantively different from the conception of disability in effect in the 2000 Census. For that reason, the Census Bureau discourages direct comparisons between the two; some residents who were counted as having a disability in 2000 might no longer be so counted in the 2010, and vice-versa.

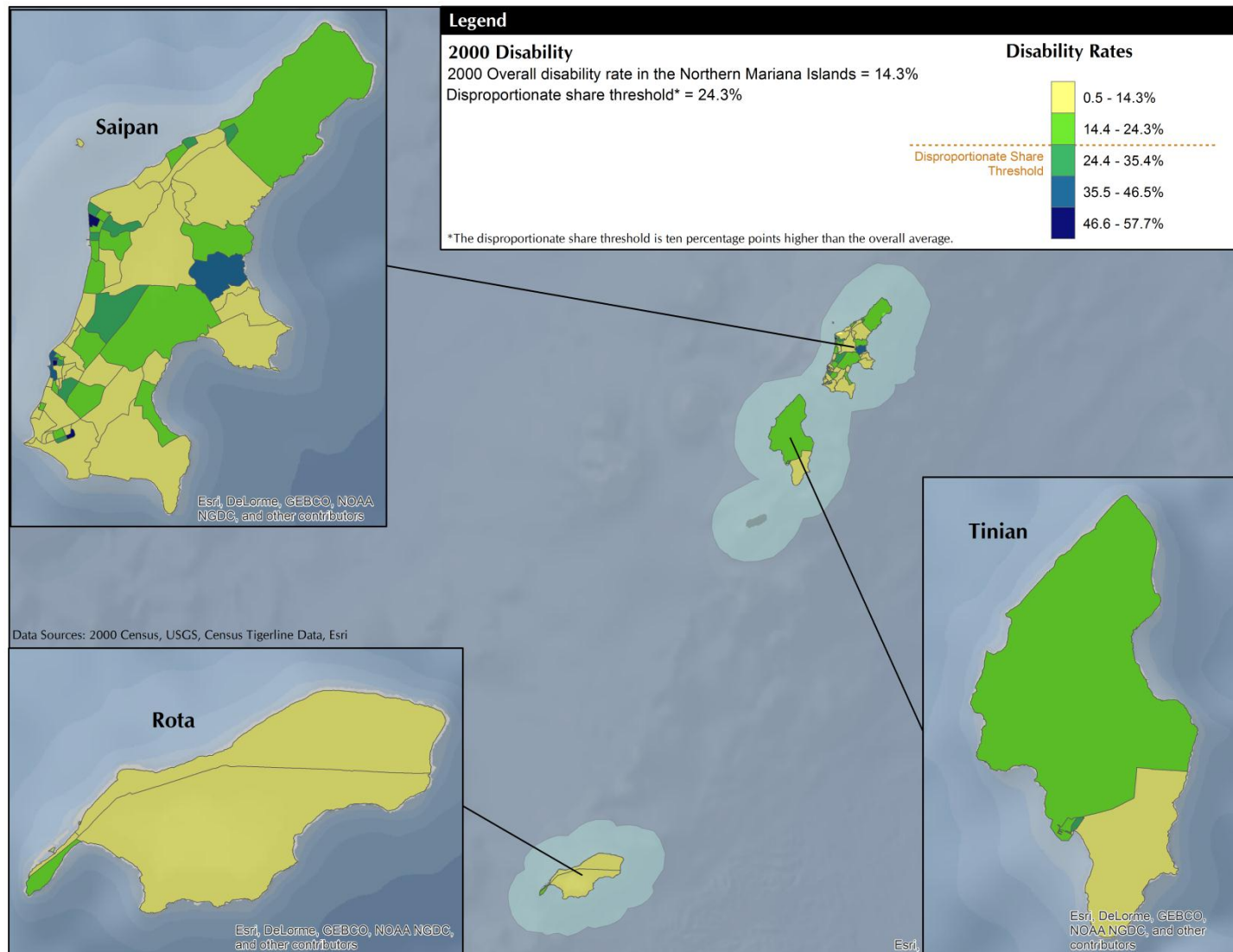
Table II.5
Disability by Age
Northern Mariana Islands
2010 Census

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	11	0.4%	12	0.5%	23	0.5%
5 to 17	242	3.8%	184	3.1%	426	3.5%
18 to 34	200	3.9%	170	2.9%	370	3.4%
35 to 64	749	5.9%	786	7.0%	1,535	6.4%
65 to 74	166	26.1%	184	36.7%	350	30.8%
75 or Older	101	51.3%	144	62.6%	245	57.4%
Total	1,469	5.3%	1,480	5.7%	2,949	5.5%

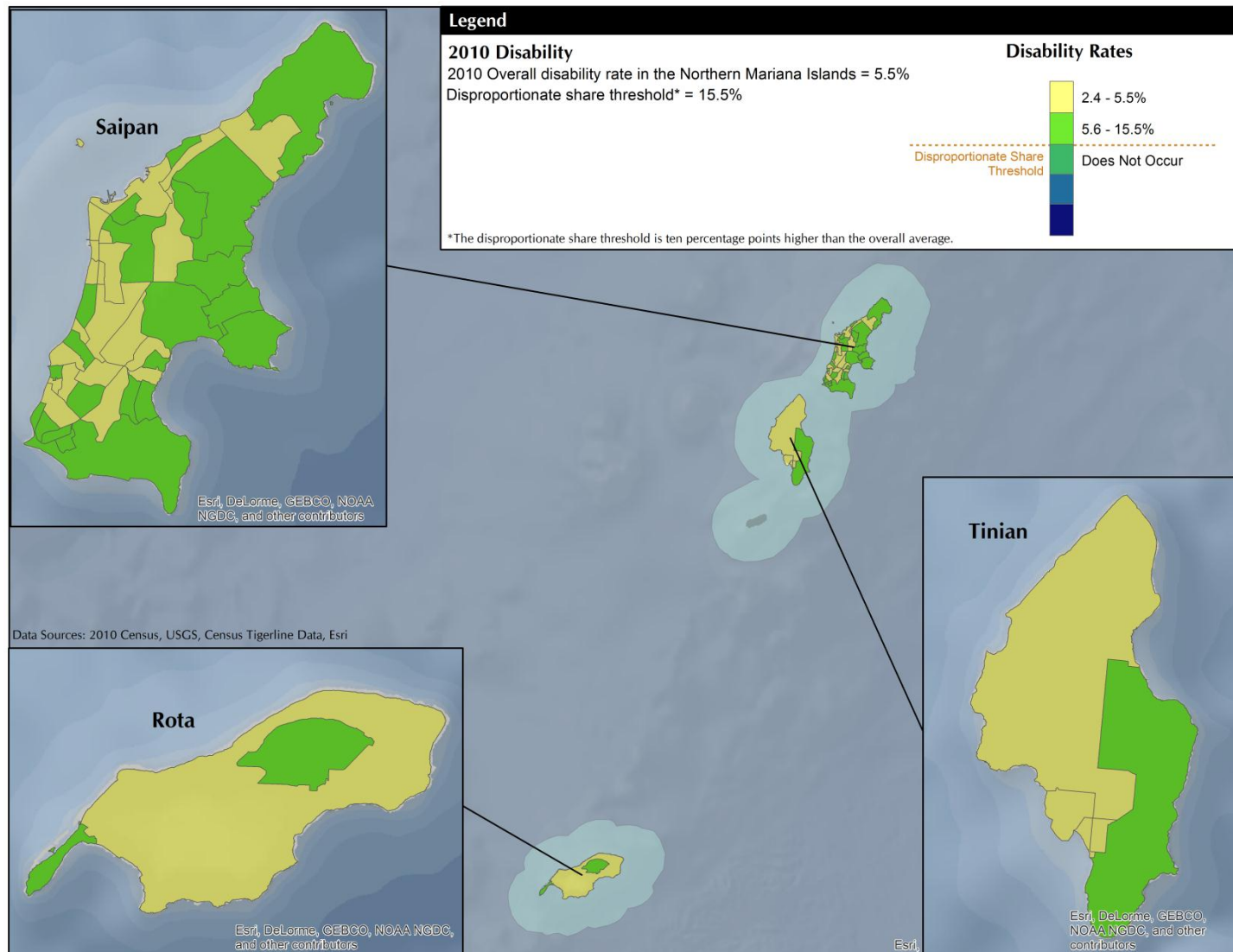
Residents living with disabilities tended to make up larger shares of the population in more populous block groups on each island in 2000, including in San Jose on Tinian, around Songsong on Rota, and along the western coastline of Saipan. Residents with disabilities also accounted for more than a third of the population of the relatively sparsely populated block group to the northwest of Kagman. These data are presented in Map II.7 on the following page.

In 2010, above-average concentrations of residents with disabilities appeared in a handful of Census block groups along the west coast of Saipan and across the eastern coastline; in and around Songsong and Sinapalo on Rota; and in the block group encompassing Eastern Tinian, Carolina Heights, and Carolinas on Tinian. These data are presented in Map II.8 on page 34.

Map II.7
2000 Population with Disabilities by Census Tract
 The Northern Mariana Islands
 2000 Census Data



Map II.8
2010 Population with Disabilities by Census Tract
 The Northern Mariana Islands
 2010 Census Data



ECONOMICS

Data indicating the size and dynamics of job markets in the Northern Mariana Islands, workforce, incomes, and persons in poverty provide essential contextual background and indicate the potential buying power of Commonwealth residents when making a housing choice.

LABOR FORCE AND EMPLOYMENT

Of the 52,898 Commonwealth residents who were over the age of 16 in 2000, some 44,465 were either working or looking for work. As shown in Table II.7 below, less than four percent of the labor force was unemployed in that year, or roughly 1,700 workers. The size of the labor force declined by 37.1 percent over the following decade, even as the number of unemployed workers grew by 82.4 percent. The result was an overall unemployment rate of 11.2 percent in 2010, which represents a 7.3 percentage-point increase in the unemployment rate. The decline in the labor force and growth in unemployment were both more pronounced on Saipan, as shown in Table A.7.A, which held most of the labor force along with the overall population. By contrast, the unemployment rate declined slightly on Tinian, as shown in Table A.7.B, and Rota, as shown in Table A.7.C.

Table II.7
Employment Status for the Population 16 Years and Over

Northern Mariana Islands
2000 & 2010 Census Data

Industry	2000 Census	2010 Census	% Change 00–10
Employed	42,753	24,826	-41.9%
Unemployed	1,712	3,123	82.4%
Civilian Labor Force	44,465	27,949	-37.1%
Unemployment Rate	3.9%	11.2%	7.3 % Points

As shown in Table II.8 on the following page, the labor force as a whole included 20,378 men and 24,093 women in 2000, most of whom were in the civilian labor force. The number of men in the civilian labor force fell by 24.1 percent, while the number of those men who were unemployed grew by 68.1 percent. Meanwhile, the number of women in the labor force declined by 48.1 percent, and the number of unemployed women nearly doubled. As a result, 9.7 percent of men in the labor force were unemployed in 2010, along with 13 percent of women. Growth in unemployment among male and female workers was more pronounced on Saipan, as shown in Table A.8.A. By contrast, the rate of unemployment fell among men on Tinian by nearly two percentage points, over the decade, and rose only slightly for women. By contrast, the unemployment rate for women on Rota fell by nearly three percentage points, while the unemployment rate for men on Rota grew, albeit by less than a percentage point. Employment data for men and women on Tinian and Rota are presented in Tables A.8.B and A.8.C, respectively.

Table II.8
Sex by Employment Status for the Population 16 Years and Over

Northern Mariana Islands
 2000 & 2010 Census Data

Industry	2000 Census		2010 Census		% Change 00–10
	Persons	% of Total	Persons	% of Total	
Male:	23,542	44.5%	19,909	51.5%	-15.4%
In Labor Force:	20,378	86.6%	15,470	77.7%	-24.1%
In Armed Forces	5	0.0%	15	0.1%	200.0%
Civilian:	20,373	100.0%	15,455	99.9%	-24.1%
Employed	19,485	95.6%	13,962	90.3%	-28.3%
Unemployed	888	4.4%	1,493	9.7%	68.1%
Not in Labor Force	3,164	13.4%	4,439	22.3%	40.3%
Female:	29,356	55.5%	18,770	48.5%	-36.1%
In Labor Force:	24,093	82.1%	12,498	66.6%	-48.1%
In Armed Forces	1	0.0%	4	0.0%	300.0%
Civilian:	24,092	100.0%	12,494	100.0%	-48.1%
Employed	23,268	96.6%	10,864	87.0%	-53.3%
Unemployed	824	3.4%	1,630	13.0%	97.8%
Not in Labor Force	5,263	17.9%	6,272	33.4%	19.2%
Total	52,898	100.0%	38,679	100.0%	-26.9%

The overall profile of jobs in the Commonwealth changed significantly between 2000 and 2010. As shown in Table II.9 below, the manufacturing sector, which employed over 40 percent of workers in 2000, declined dramatically over the decade with the collapse of the Commonwealth's textile industry, employing less than three percent of the working population of the Commonwealth in 2010. In the face of this decline, as well as an overall decline in the labor force, workers in other industries came to account for larger shares of the working population. This was most pronounced in the arts, entertainment, and food services sector, which accounted for 22.2 percent of the working population in 2010, along with the educational, health, and social services sector, which accounted for 12.4 percent of the working population in 2010, up from 5.2 percent in 2000.

Table II.9
Industry For the Employed Civilian Population

Northern Mariana Islands
 2000 & 2010 Census Data

Industry	2000 Census		2010 Census		% Change 00–10
	Persons	% of Total	Persons	% of Total	
Agriculture, Forestry, Fishing, and Mining	623	1.5%	472	1.9%	-24.2%
Construction	2,785	6.5%	1,786	7.2%	-35.9%
Manufacturing	17,398	40.7%	689	2.8%	-96.0%
Wholesale Trade	680	1.6%	700	2.8%	2.9%
Retail Trade	3,056	7.1%	2,645	10.7%	-13.4%
Transportation, Warehousing and Utilities	1,449	3.4%	1,429	5.8%	-1.4%
Information	603	1.4%	496	2.0%	-17.7%
Finance, Insurance and Real Estate	1,013	2.4%	1,064	4.3%	5.0%
Professional, Scientific, and Management Services	2,117	5.0%	1,974	8.0%	-6.8%
Educational, Health, and Social Services	2,239	5.2%	3,085	12.4%	37.8%
Arts, Entertainment and Food Services	5,834	13.6%	5,519	22.2%	-5.4%
Other Services	2,373	5.6%	2,553	10.3%	7.6%
Public Administration	2,583	6.0%	2,414	9.7%	-6.5%
Total Working Population	42,753	100%	24,826	100%	-41.9%

These same trends were present on Saipan, as shown in Table A.9.A, but as is often the case, the patterns were somewhat more pronounced on Saipan than in the Commonwealth as a whole. In addition, because Saipan was home to most of the manufacturing base of the

Commonwealth in 2000, the dramatic decline in the manufacturing sector over the following decade did little to change the composition of the labor market on Tinian and Rota, at least as far as concerned the type of jobs that residents held. On Tinian, workers employed in public administration came to account for a larger share of the working population, along with those employed in educational, health, and social services; transportation, warehousing, and utilities; and professional, scientific, and management services. Rota saw marked declines in the number of jobs in retail trade; construction; agriculture, forestry, fishing, and mining; arts, entertainment, and food services; and public administration. Data detailing trends in the working population of Tinian and Rota are presented in Tables A.9.B and A.9.C, respectively.

HOUSEHOLD INCOME

Income data from the 2000 and 2010 Census suggest that the average household income for the Commonwealth fell after 2000 as a growing percentage of households were earning less than \$25,000 per year. At the same time, the number of households earning \$25,000 per year or more grew at a below-average rate or declined, as shown in Table II.10 below. While 46.7 percent of households were earning \$25,000 per year or more in 2000, that share slipped by more than five percentage points over the following decade.

Table II.10
Households by Income
Northern Mariana Islands
2000 and 2010 Census

Income	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Less than \$5,000	918	6.5%	1,461	9.1%	59.2%
\$5,000 to \$9,999	1,961	14.0%	2,529	15.8%	29.0%
\$10,000 to \$14,999	1,892	13.5%	2,097	13.1%	10.8%
\$15,000 to \$19,999	1,540	11.0%	1,945	12.1%	26.3%
\$20,000 to \$24,999	1,195	8.5%	1,404	8.8%	17.5%
\$25,000 to \$29,999	911	6.5%	982	6.1%	7.8%
\$30,000 to \$49,999	2,684	19.1%	2,653	16.5%	-1.2%
\$50,000 to \$74,999	1,556	11.1%	1,557	9.7%	0.1%
\$75,000 to \$99,999	644	4.6%	673	4.2%	4.5%
\$100,000 or More	754	5.4%	734	4.6%	-2.7%
Total	14,055	100.0%	16,035	100.0%	14.1%

A similar overall shift occurred on Saipan, where the share of households earning less than \$30,000 per year rose by around five percentage points, and the share of higher-earning households fell, as shown in Table A.10.A. The same was largely true of Rota, as shown in Table A.10.C, though the share of households earning \$75,000 to \$99,000 actually increased by 1.5 percentage points. It is also noteworthy that Rota was the only island to experience an actual reduction in the number of households over the decade. Trends in household income on Tinian differed considerably from trends on the other two islands, with growth in the shares of households in the low- to middle-income range, and a decline in the shares of households in the low and high ends of the income range. Household income data for Tinian are presented in Table A.10.B.

POVERTY

The Census Bureau uses a set of income thresholds that vary by family size and composition to determine poverty status. If a family's total income is less than the threshold for its size, then

that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation using the Consumer Price Index. The official poverty definition counts income before taxes and does not include capital gains and non-cash benefits such as public housing, Medicaid, and food stamps.

As the share of lower-income households grew in most areas throughout the Commonwealth, the share of residents living in poverty also grew. As shown in Table II.11 below, the percentage of residents living in poverty; i.e., the poverty rate; rose from 46 percent in 2000 to 52.3 percent in 2010. Residents aged 18 to 64 were the most highly impacted by poverty; however, as the poverty rate rose over the decade, children aged 6 to 17 came to represent a larger share of the population in poverty. Overall poverty rates throughout the Commonwealth in 2000 and 2010 were considerably higher than U.S. figures in those years, which were 12.2 and 15.3 percent, respectively.¹⁴

Table II.11
Poverty by Age
Northern Mariana Islands
2000 & 2010 Census

Age	2000 Census		2010 Census		% Change 00–10
	Persons in Poverty	% of Total	Persons in Poverty	% of Total	
Under 6	2,715	8.6%	3,291	11.8%	21.2%
6 to 17	3,862	12.2%	6,026	21.6%	56.0%
18 to 64	24,815	78.4%	18,102	64.8%	-27.1%
65 or Older	272	0.9%	502	1.8%	84.6%
Total	31,664	100.0%	27,921	100.0%	-11.8%
Poverty Rate	46.0%	.	52.3%	.	6.3%

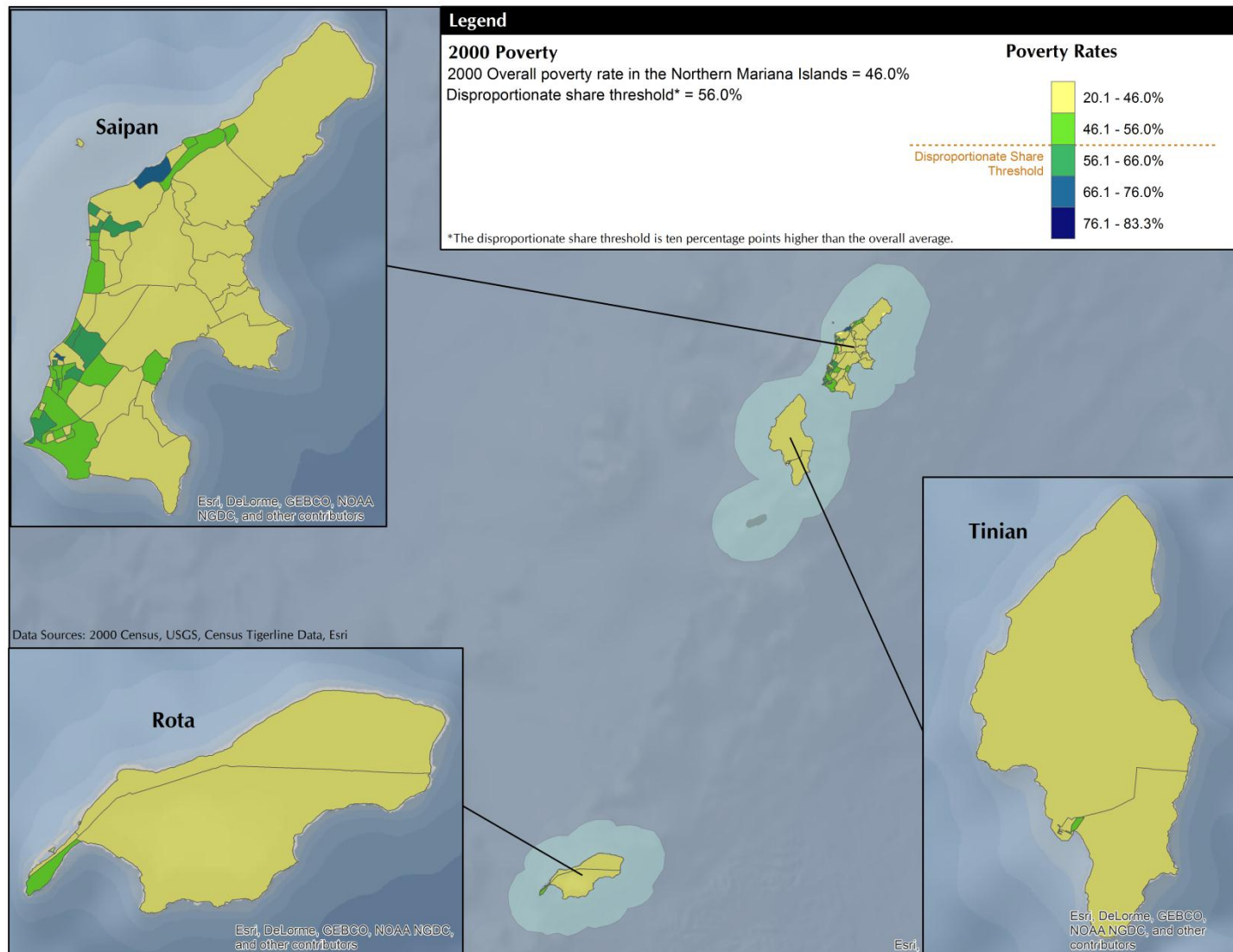
The poverty rate on Saipan was slightly higher than the overall poverty rate in both years, though island-level trends on Saipan largely mirrored trends in the Commonwealth as a whole, as shown in Table A.11.A. The poverty rate on Tinian was slightly lower, at 41.2 percent in 2000 and 43.6 percent in 2010, as shown in Table A.11.B. The most pronounced increase in the poverty rate was observed on the island of Rota, where the share of residents living in poverty grew from 34.2 percent in 2000 to 44.4 percent in 2010, as shown in Table A.11.C. In all three cases, growth in the poverty rate was due in part to the decline in the number of higher income residents.

As shown in Map II.9 on the following page, it was the more populous areas of each island that tended to have above-average and disproportionate rates of poverty in 2000. On Saipan, more than two-thirds, and as much as three-quarters, of the population was living in poverty in a block group in Susupe and the block group straddling Lower Base and Puerto Rico. In general, block groups with above-average and disproportionately high poverty rates on Saipan were clustered along the western coastline. Above-average poverty rates were also observed in and around Songsong on Rota and San Jose on Tinian.

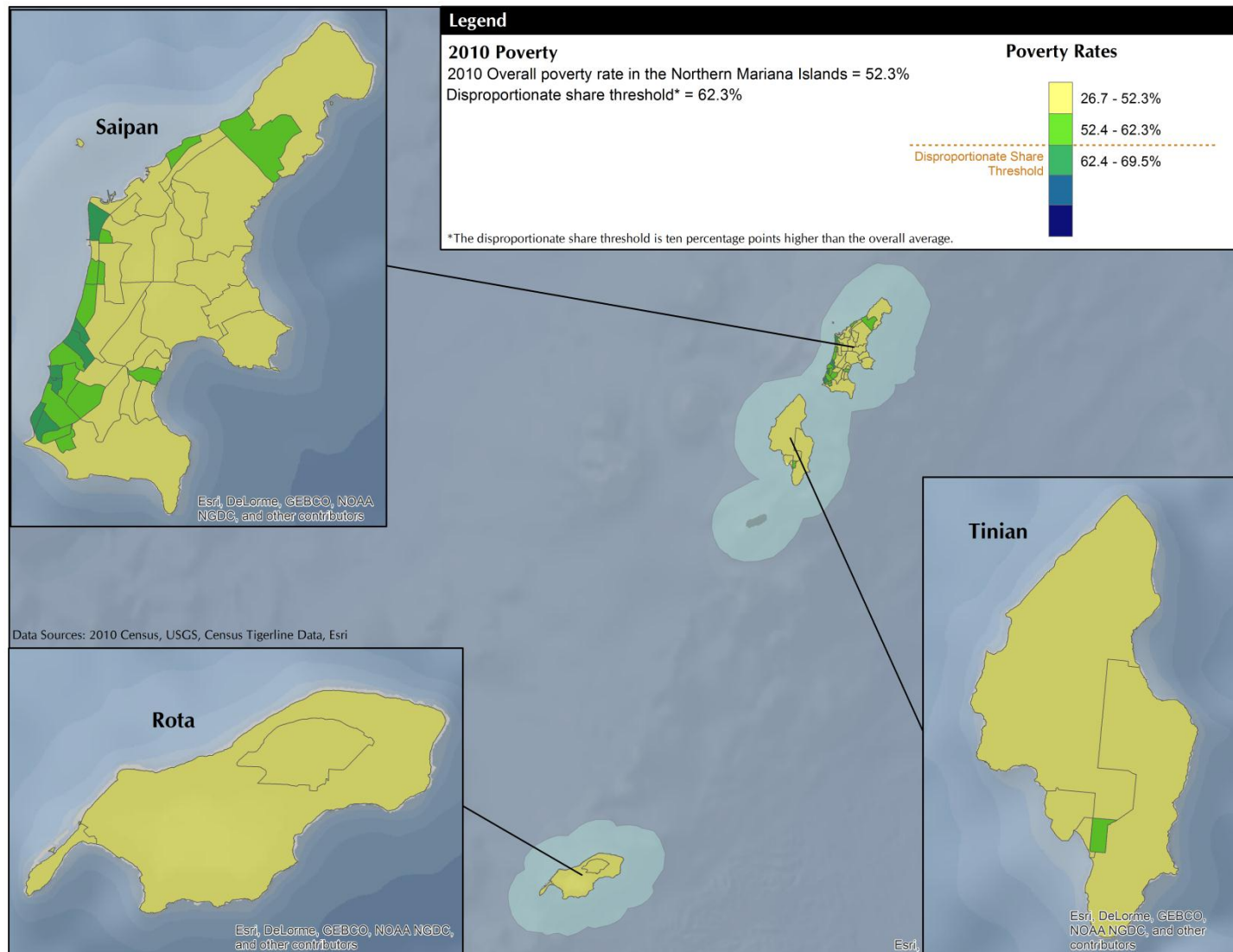
By 2010, the average poverty rate had risen considerably, from 46 to 52.3 percent. However, the overall geographic distribution of poverty was similar in that year to what it had been a decade earlier, as shown in Map II.10 on page 40. However, there were no block groups on Rota in which the poverty rate exceeded the Commonwealth average for that year.

¹⁴ 2000 and 2010 American Community Surveys

Map II.9
2000 Poverty Rates by Census Tract
 The Northern Mariana Islands
 2000 Census Data



Map II.10
2010 Poverty Rates by Census Tract
 The Northern Mariana Islands
 2010 Census Data



HOUSING

Simple counts of housing by age, type, tenure, and other characteristics form the basis for the housing stock background, suggesting the range of housing choice available to the average commonwealth resident. Examination of households, on the other hand, shows how residents use the available housing, and shows household size and housing problems such as incomplete plumbing and/or kitchen facilities. Review of housing costs reveals the markets in which housing consumers in the Commonwealth can shop.

CHARACTERISTICS OF THE HOUSING STOCK

Though the total population living in households increased from 51,430 to 53,312, the growth in the number of housing units in the Commonwealth outpaced growth in the number of households between 2000 and 2010; as a result, the share of occupied units fell. As shown in Table II.12 below, some 80 percent of housing units were occupied in 2000, and around 32 percent of those were occupied by the people who owned them. By 2010, the share of occupied units had fallen to 76.9 percent. Only 28.3 percent of those units were occupied by their owners in that year; the share of renter-occupied households had grown from 67.6 to 71.7 percent. The number of vacant units grew by 37.1 percent over the same time period.

Table II.12
Housing Units by Tenure
Northern Mariana Islands
2000 & 2010 Census

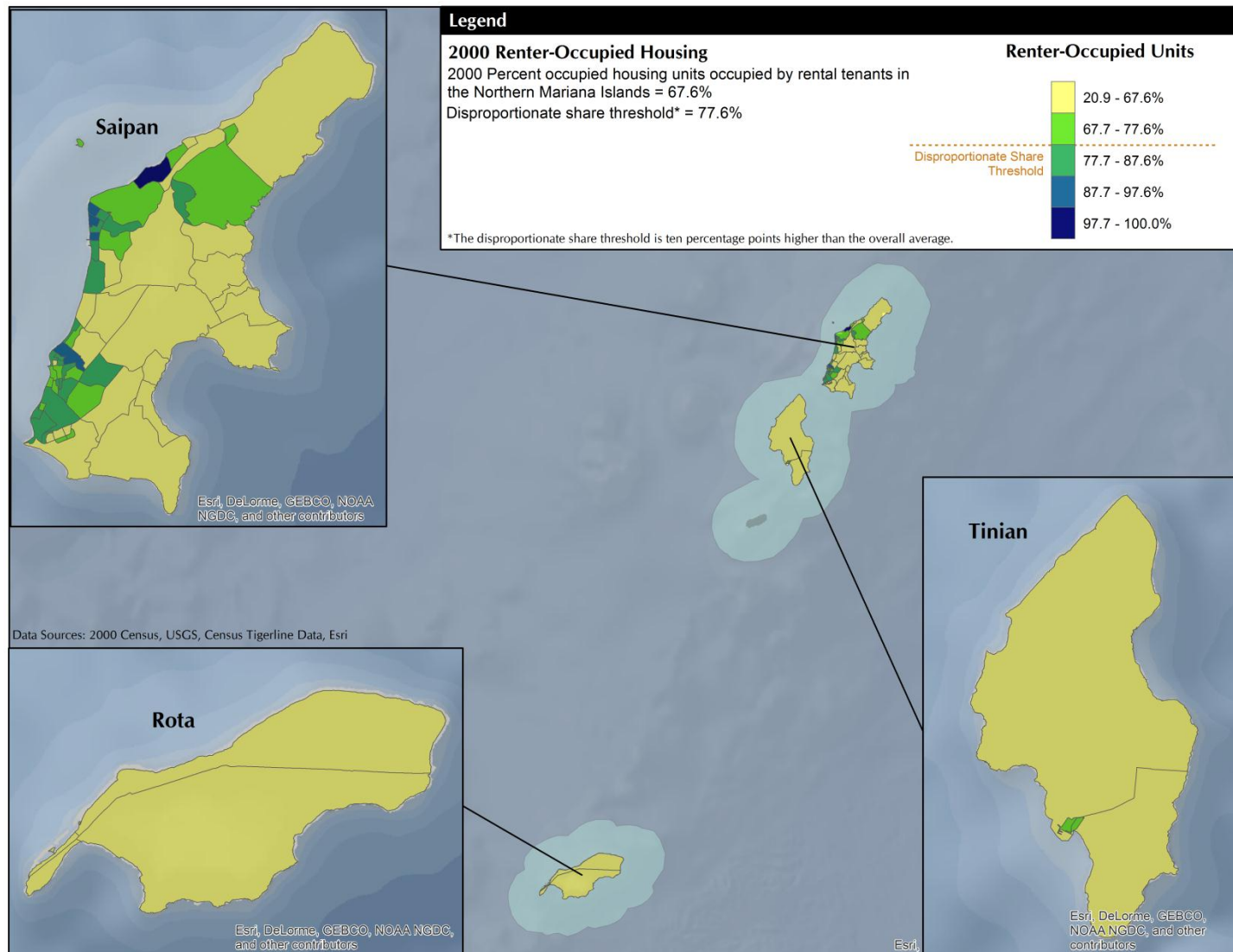
Tenure	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	14,055	80.0%	16,035	76.9%	14.1%
Owner-Occupied	4,549	32.4%	4,537	28.3%	-0.3%
Renter-Occupied	9,506	67.6%	11,498	71.7%	21.0%
Vacant Housing Units	3,511	20.0%	4,815	23.1%	37.1%
Total Housing Units	17,566	100.0%	20,850	100.0%	18.7%

Trends in housing occupancy on Saipan reflected those overall trends closely, as shown in Table A.12.A. By contrast, the number and share of occupied units on Tinian rose over the decade, and the shift toward rental housing was less pronounced, as shown in Table A.12.B. The share of vacant housing units rose by more than five percentage points on Rota, as shown in Table A.12.C. And while a majority of occupied units on Rota were owner-occupied in 2000 and a minority were renter-occupied, that trend had reversed by 2010, when 56.7 percent of occupied units were occupied by rental tenants.

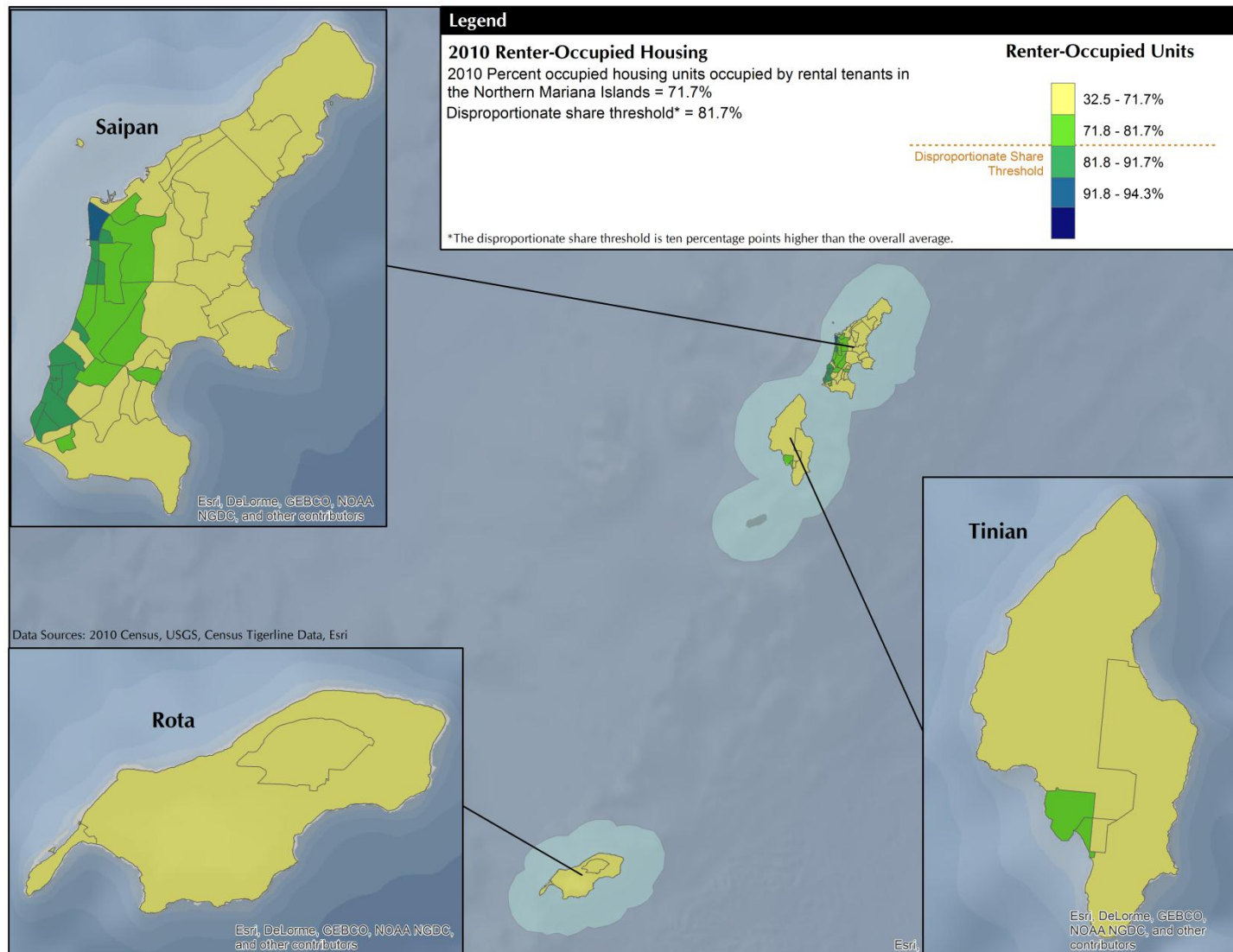
A considerable majority of occupied housing units were occupied by rental tenants in 2000, or 67.6 percent. As shown in Map II.11 on the following page, occupied units on the west coast of Saipan were generally more likely to be occupied by rental tenants than housing units further to the east. The rate of rental tenancy was uniformly below average in blocks groups on Rota. On Tinian, the rate of rental tenancy in block groups near the center of San Jose exceeded the Commonwealth average.

A similar overall distribution of renter-occupied units was observed in 2010, as shown in Map II.12 on page 43. By the end of the decade, the share of occupied units that were occupied by rental tenants had grown to 71.7 percent throughout the Commonwealth.

Map II.11
2000 Renter-Occupied Housing Units
 The Northern Mariana Islands
 2000 Census Data



Map II.12
2010 Renter-Occupied Housing Units
 The Northern Mariana Islands
 2010 Census Data



The share of owner-occupied housing units in 2000 was highest on Saipan, particularly in eastern Census block groups¹⁵, as shown in Map II.13 on the following page. The highest rates of owner-occupancy were observed around Kagman, where more than two occupied units in three were owned by the people who lived in them. Owner-occupied units also accounted for a relatively large share of occupied units near Tanapang and I Naftan on Saipan, throughout the island of Rota, and outside of central San Jose on Tinian. The overall picture was similar in 2010, as shown in Map II.14 on page 46. Areas with high concentrations of rental housing also tended to have higher concentrations of Asian residents, and residents who were not of Chamorro or Carolinian descent.

VACANT HOUSING

The composition of the vacant housing stock also shifted between 2000 and 2010, as shown in Table II.13 below. Greater shares of vacant housing units in the Commonwealth were available to rent at the end of the decade, and smaller shares were available for any other purpose. The number of “other vacant” housing units also grew, from 31.4 to 33.5 percent of all vacant housing units in 2010. These units tend to be more problematic than vacant units in general, since they are not available to the market place and may contribute to blight where they are grouped in close geographic proximity.

Table II.13
Disposition of Vacant Housing Units
Northern Mariana Islands
2000 & 2010 Census

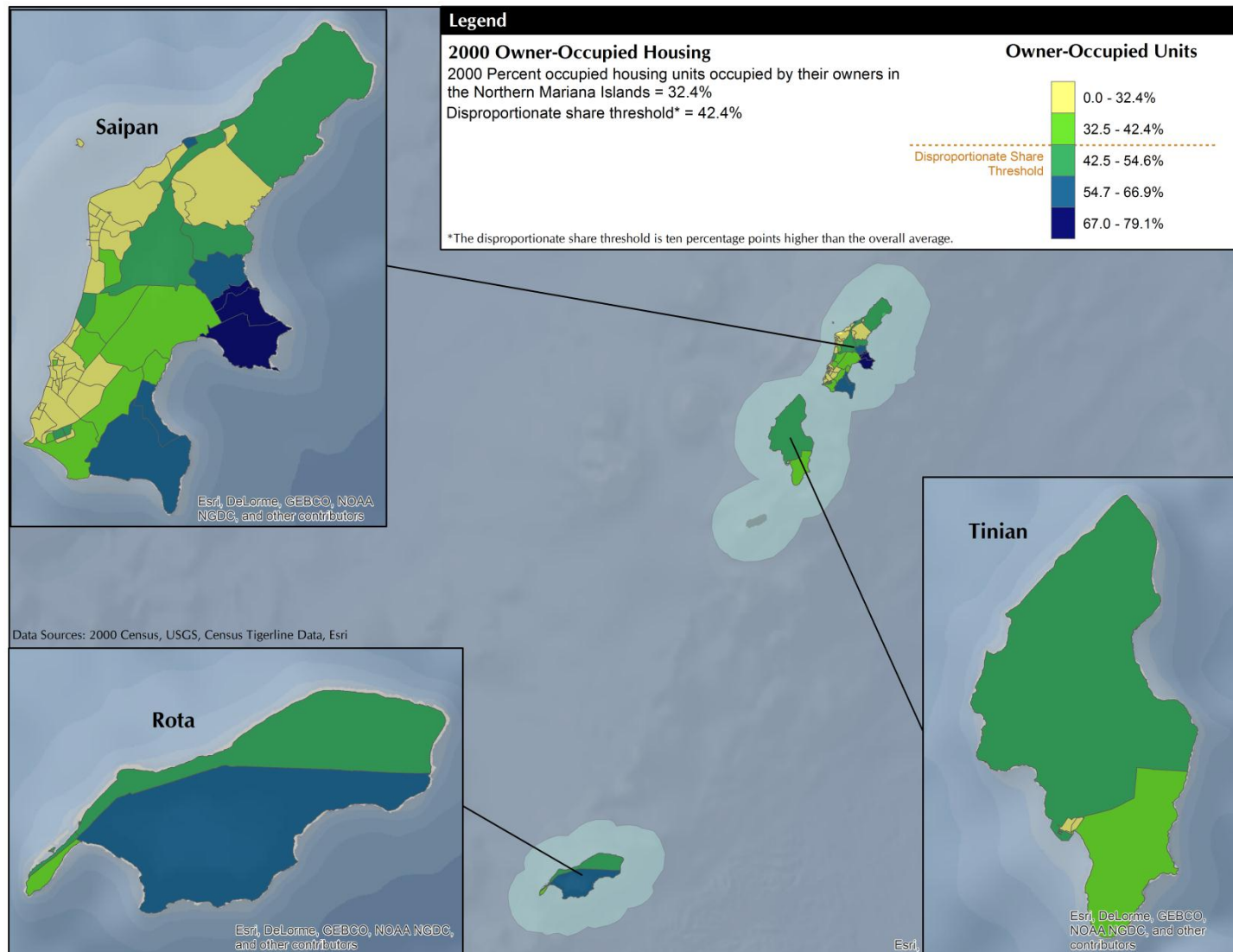
Disposition	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
For Rent	1,814	51.7%	2,629	54.6%	44.9%
For Sale	91	2.6%	46	1.0%	-49.5%
Rented or Sold, Not Occupied	95	2.7%	105	2.2%	10.5%
For Seasonal, Recreational, or Occasional Use	362	10.3%	387	8.0%	6.9%
For Migrant Workers	45	1.3%	33	0.7%	-26.7%
Other Vacant	1,104	31.4%	1,615	33.5%	46.3%
Total	3,511	100.0%	4,815	100.0%	37.1%

As usual, trends in vacant housing units on Saipan tended to reflect overall trends in the Commonwealth, as shown in Table A.13.A; not so on Tinian, where the number and share of vacant units available for rent fell. Additionally, as shown in Table A.13.B, the share of “other vacant” units rose from 38.1 to 50.4 percent, representing 22 additional units classified as “other vacant.” Meanwhile, the share of “other vacant” units fell on Rota, as shown in Table A.13.C, while the share of units available for rent rose from 22.3 to 49.3 percent.

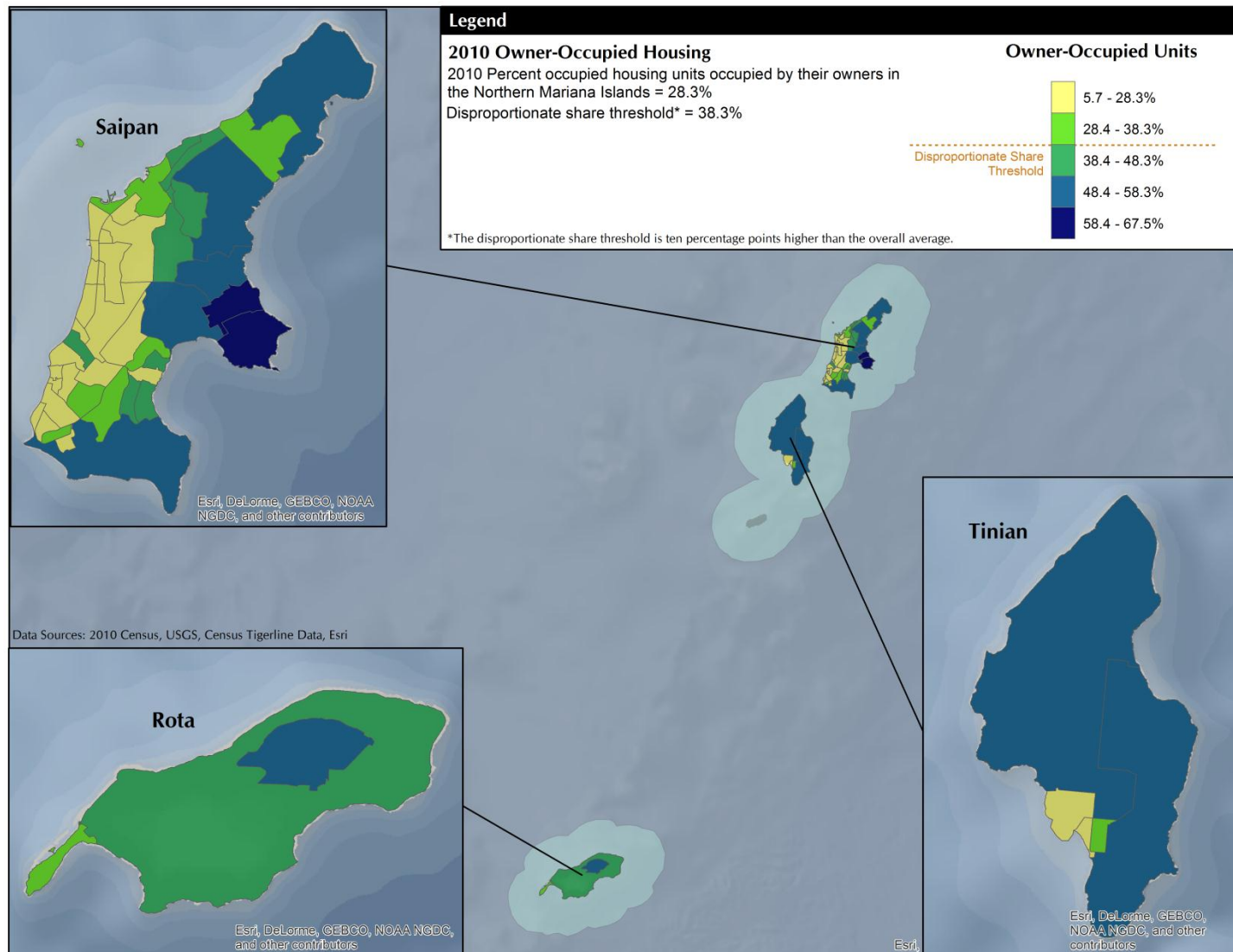
While high numbers of vacant units can be problematic, there are many reasons that housing units may be unoccupied, and vacancies can be temporary. However, units classified as “other vacant” units are a greater cause for concern, as these units are not available to the housing market, and if located in close proximity to each other may represent a blighting influence.

¹⁵ It is to be expected that the rate of owner-occupancy will be higher where rental occupancy rates are lower, since rental-occupancy and owner-occupancy are complementary concepts in this analysis. Accordingly, where the share of owner-occupied units increases by one percentage point from one block group to the next, the rental occupancy rate will be one percentage point lower.

Map II.13
2000 Owner-Occupied Housing Units
 The Northern Mariana Islands
 2000 Census Data



Map II.14
2010 Owner-Occupied Housing Units
 The Northern Mariana Islands
 2010 Census Data



One housing unit in five was vacant in 2000. As shown in Map II.15 on the following page, vacant units tended to account for relatively large shares of the housing stock in block groups near American Memorial Park on Saipan’s western coast, as well as in and around Kagman III. On Tinian, 30.1 to 42.2 percent of housing units in that year were vacant in block groups in and around central San Jose.

Between 2000 and 2010, the overall vacancy rate throughout the Commonwealth had risen to 23.1 percent. As shown in Map II.16 on page 49, areas with above-average concentrations of vacant units appeared throughout the three main islands. More than a third of housing units were unoccupied in block groups to the north of American Memorial Park on Saipan, as well as in the large, sparsely populated block group covering most of Rota.

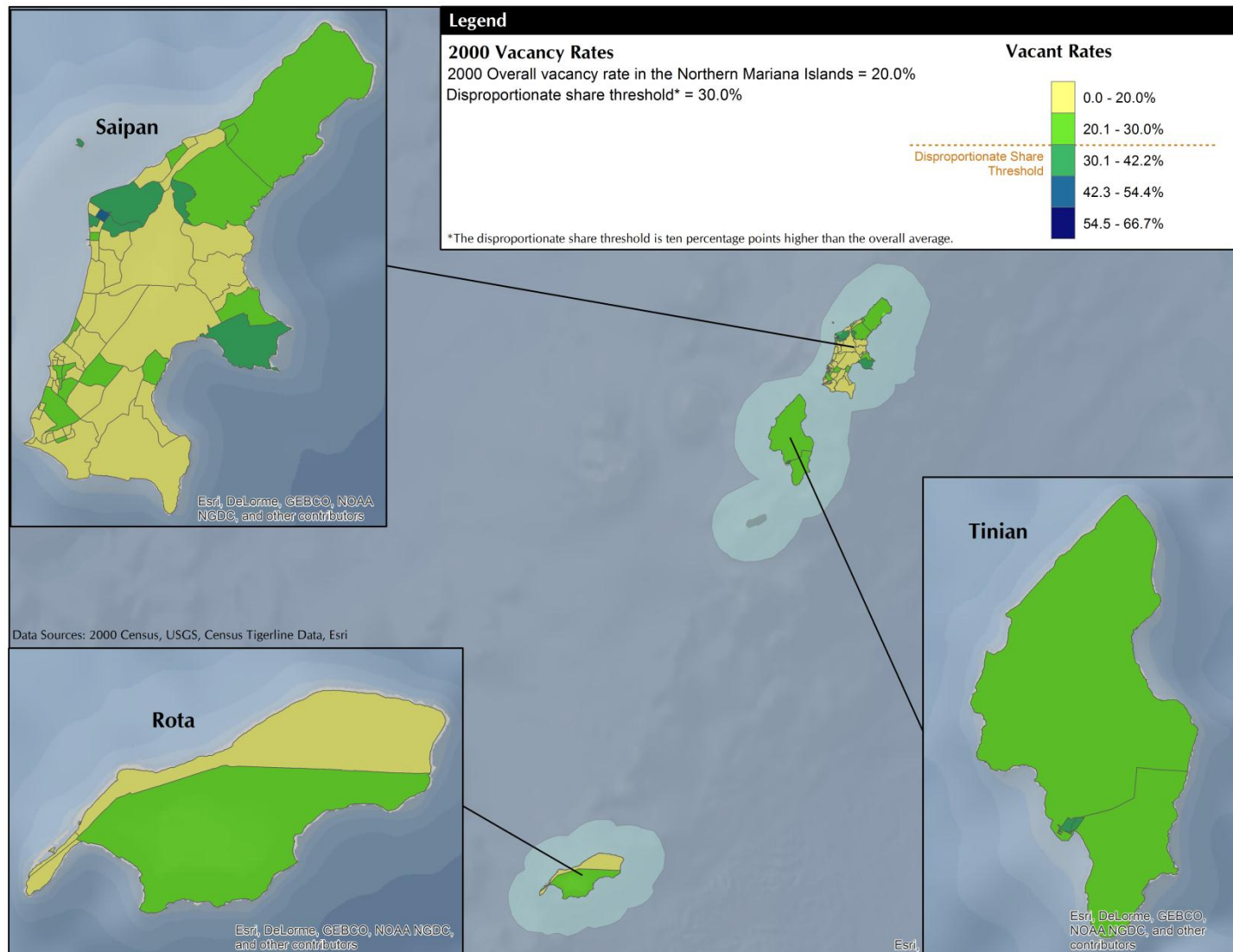
A majority of vacant housing units were available for rent or for sale, or were slated for other uses in 2000. However, 31.4 percent of vacant housing units throughout the Commonwealth were classified as “other vacant.” In many cases, areas with high concentrations of “other vacant” units tended to have lower overall vacancy rates. However, there were some notable concentrations of “other vacant” units in the block group to the immediate south of American Memorial Park in 2000, as shown in Map II.17 on page 50, as well as in Kagman III and Capitol Hill. “Other vacant” units also accounted for a relatively large share of housing units on Tinian, in a block group in central San Jose.

“Other vacant” housing units accounted for a third of all vacant housing units in the Commonwealth in 2010. In that year, “other vacant” units tended to account for relatively large shares of vacant housing units in and around Kagman, San Jose (Oleai), and As Terlaje on Saipan, as shown in Map II.18 on page 51.

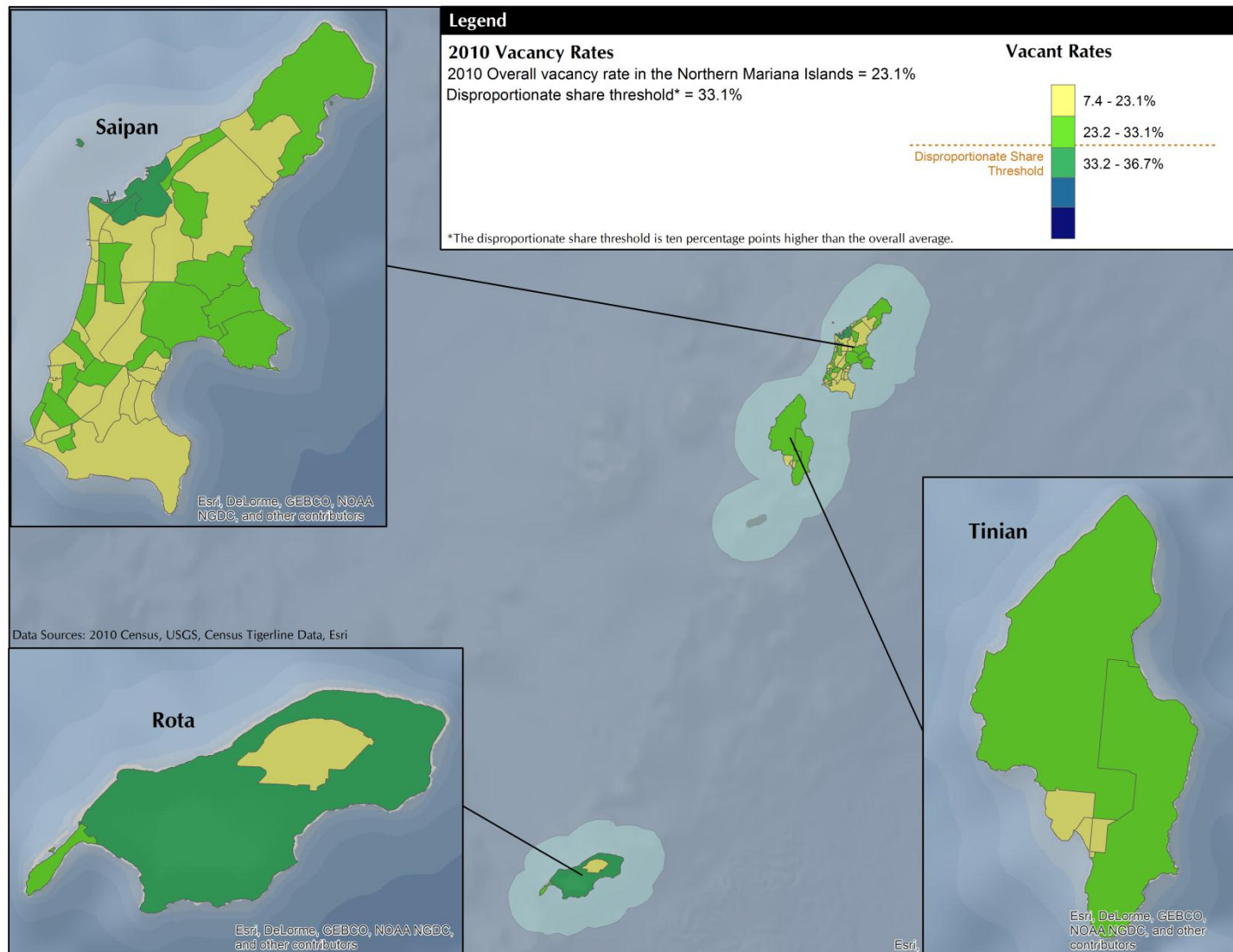
HOUSING UNITS BY TYPE

Apartment units came to account for a larger share of housing units in the Commonwealth as a whole, as shown in Table II.14 on page 52. From just over a quarter of all housing units in 2000, the percentage of apartment units rose to 32 percent. At the same time, single-family units declined as a share of housing units from 62.3 to 58.1 percent. The same was largely true of the housing stock on Saipan, as shown in Table A.14.A, though apartment units accounted for a larger share of housing units on the island in both years. Similarly, the number of apartments on Rota doubled over the decade, while the number of single-family units declined, as shown in Table A.14.C. By contrast, single-family units on Tinian grew in number and as a share of the housing stock, as shown in Table A.14.B. Meanwhile, the number and share of apartment units fell over the decade.

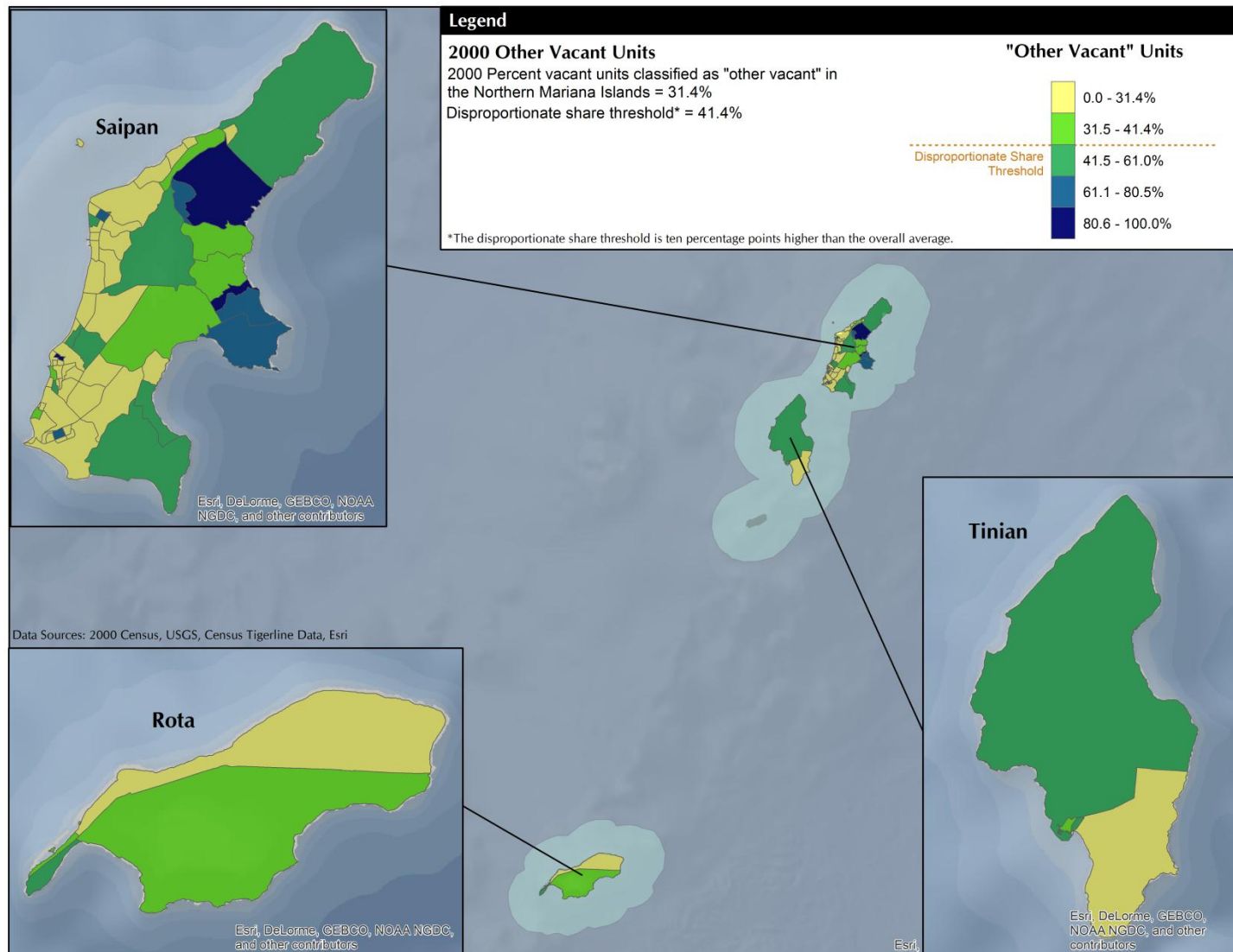
Map II.15
2000 Vacant Housing Units
 The Northern Mariana Islands
 2000 Census Data



Map II.16
2010 Vacant Housing Units
 The Northern Mariana Islands
 2010 Census Data



Map II.17
2000 “Other Vacant” Housing Units
 The Northern Mariana Islands
 2000 Census Data



Map II.18
2010 “Other Vacant” Housing Units
 The Northern Mariana Islands
 2010 Census Data

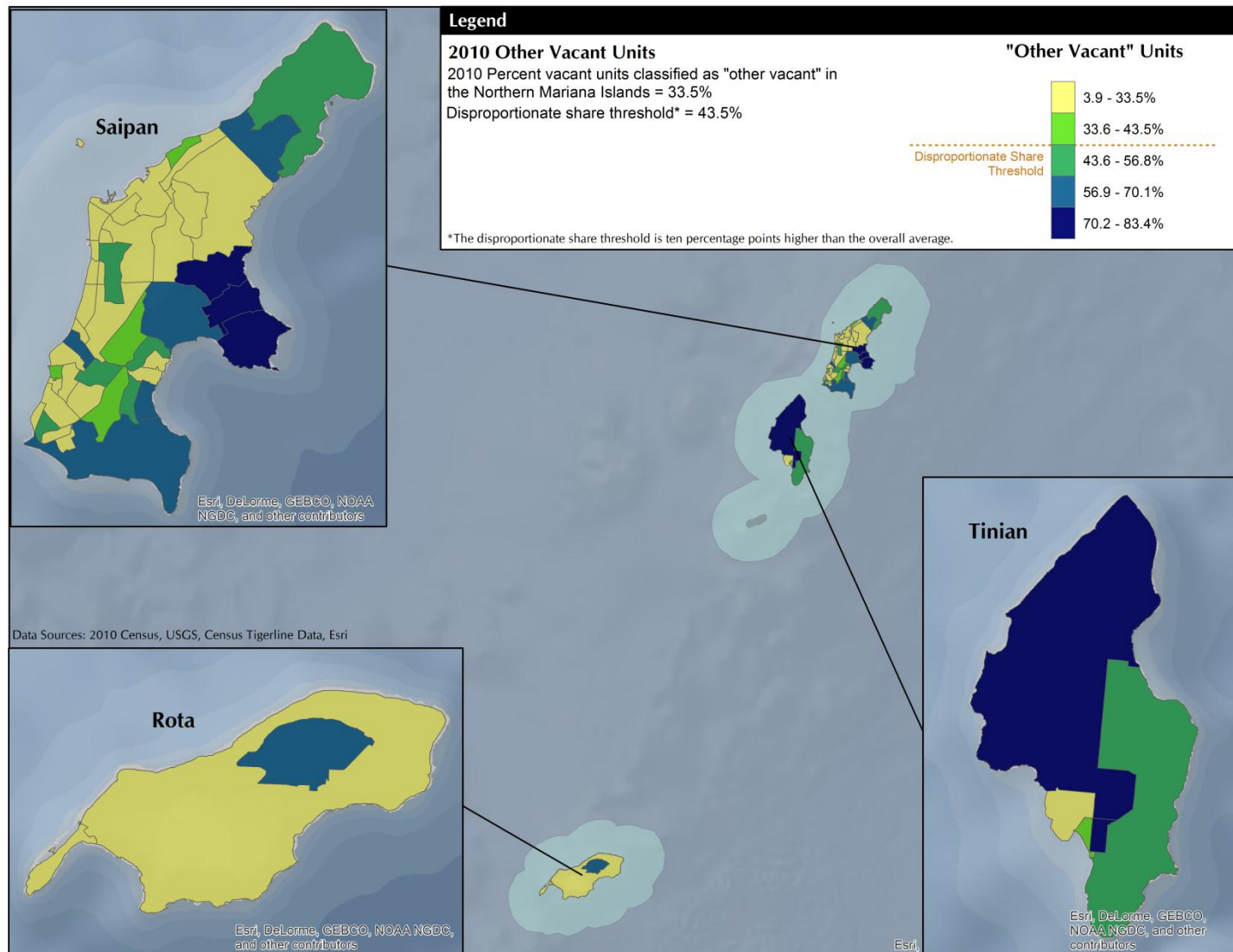


Table II.14
Housing Units by Type
 Northern Mariana Islands
 2000 and 2010 Census

Unit Type	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
Single-Family	10,948	62.3%	12,110	58.1%	10.6
Duplex	522	3.0%	587	2.8%	12.5
Tri- or Four-Plex	1,324	7.5%	1,333	6.4%	0.7
Apartment	4,640	26.4%	6,674	32.0%	43.8
Mobile Home	67	0.4%	63	0.3%	-6.0
Boat, RV, Van, Etc.	39	0.2%	16	0.1%	-59.0
Container	26	0.1	67	0.3%	157.7
Total	17,566	100.0%	20,850	100.0%	18.7%

Around 26 housing units in the Commonwealth were repurposed from shipping containers in 2000, or 0.1 percent of all housing units. As shown in Map II.19 on the following page, these units tended to be concentrated in or around Lower Base on Saipan in that year. These units were more common in 2010, when they totaled 67 in number throughout the Commonwealth. In that year, there were no areas in which these units accounted for disproportionate shares of housing units, as shown in Map II.20 on page 54.

HOUSEHOLDS BY SIZE

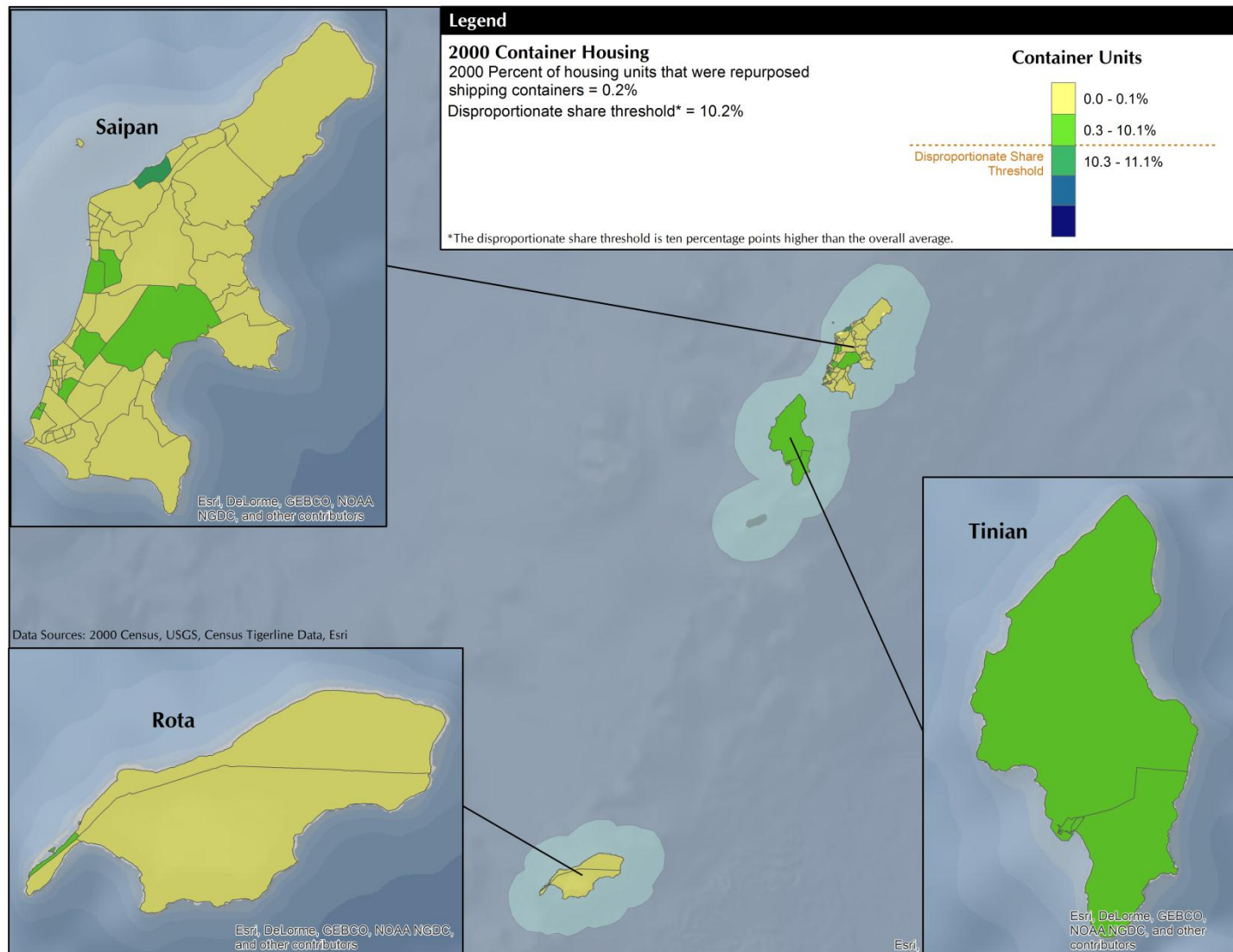
As shown in Table II.15 below, just under one fifth of households in 2000 were occupied by one person. By 2010, that share had grown to 22 percent. In fact, the households with four members or fewer all increased in number over the decade, representing larger shares of Commonwealth households overall in 2010 than they had in 2000. At the same time, growth in the number of households with five members or more was relatively slow, and the Commonwealth saw a decline in the number of households with six members or more. Similar shifts in household size occurred on Saipan and Tinian, as shown in Table A.15.A and A.15.B. Rota, meanwhile, saw declines in the number of four-, five-, and six-person households.

The average household size fell considerably between 2000 and 2010 throughout the Commonwealth as a whole, from 3.66 members per household to around 3.26 members per household, which is still quite high by national standards. This led to an increased demand for housing over the decade.

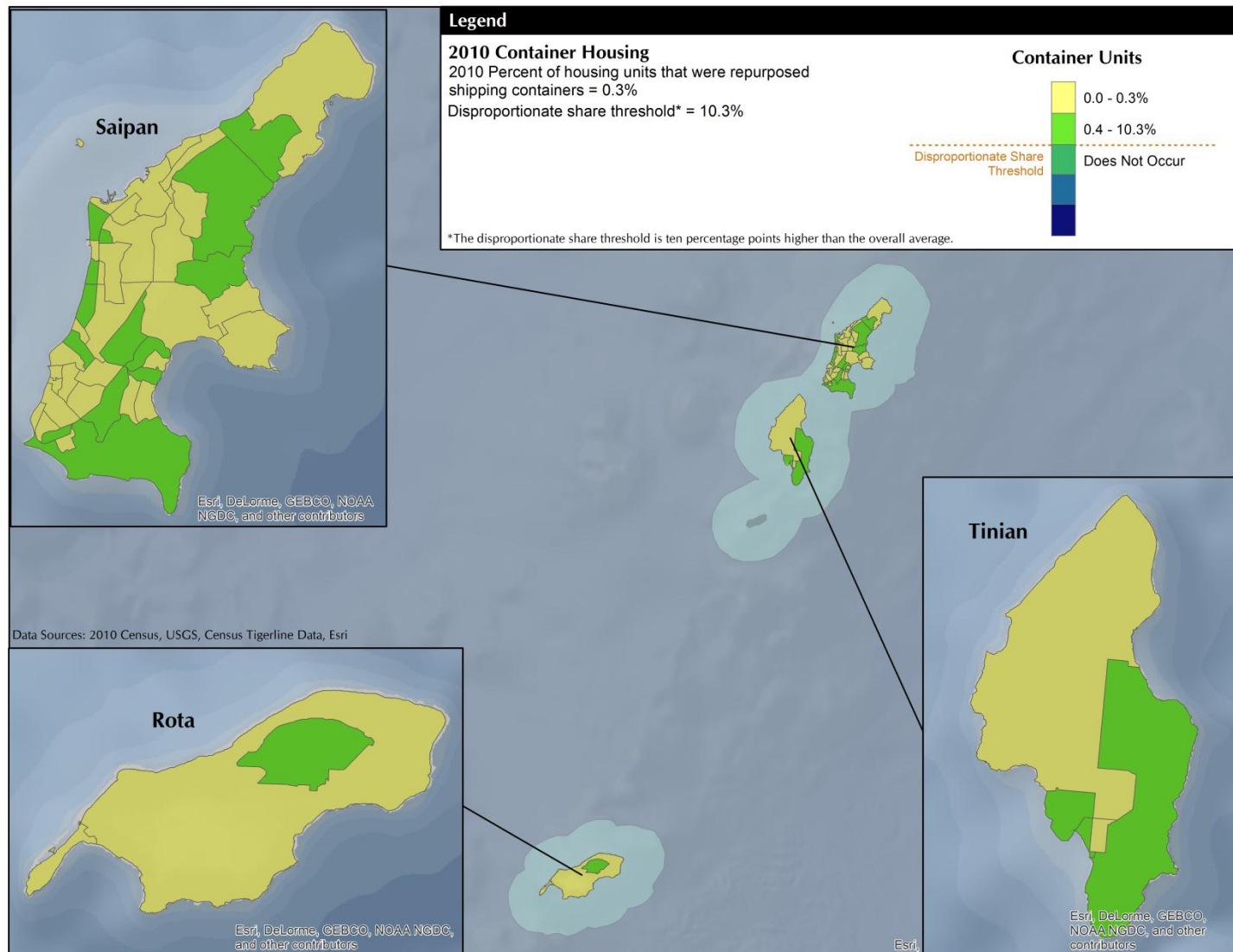
Table 1.14
Households by Household Size
 Northern Mariana Islands
 2000 & 2010 Census

Size	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
One Person	2,699	19.2%	3,531	22.0%	30.8%
Two Persons	2,876	20.5%	3,515	21.9%	22.2%
Three Persons	2,145	15.3%	2,795	17.4%	30.3%
Four Persons	2,032	14.5%	2,447	15.3%	20.4%
Five Persons	1,599	11.4%	1,638	10.2%	2.4%
Six Persons or More	2,704	19.2%	2,109	13.2%	-22.0%
Total	14,055	100.0%	16,035	100.0%	14.1%

Map II.19
2000 Container Housing Units
 The Northern Mariana Islands
 2000 Census Data



Map II.20
2010 Container Housing Units
 The Northern Mariana Islands
 2010 Census Data



HOUSING PROBLEMS

Fewer commonwealth households experienced overcrowding in 2010 than had in 2000. Housing units are considered overcrowded when they include more than one but less than 1.5 residents per room, and are considered severely overcrowded when the number of occupants per room exceeds 1.5. As shown in Table II.16 below, around 16 percent of housing units were overcrowded in 2000, and 28.8 percent were severely overcrowded. By 2010, the share of overcrowded units had fallen by 0.6 percentage points, and the share of severely-overcrowded units had fallen by more than half. This trend was largely mirrored on all three islands, and the decline was even more pronounced on Tinian and Rota. Overcrowding data for Saipan, Tinian, and Rota are presented in Tables A.16.A, A.16.B, and A.16.C, respectively.

Table II.16
Overcrowding and Severe Overcrowding

Northern Mariana Islands
2000 & 2010 Census Data

2000 & 2010 Census Data							
Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	2,105	46.3%	1,003	22.0%	1,441	31.7%	4,549
2010 Census	3,188	70.3%	793	17.5%	556	12.3%	4,537
% Change 00–10	51.4%	24.0%	-20.9	-4.6%	-61.4	-19.4%	-0.3
Renter							
2000 Census	5,662	59.6%	1,243	13.1%	2,601	27.4%	9,506
2010 Census	8,197	71.3%	1,675	14.6%	1,626	14.1%	11,498
% Change 00–10	44.8%	11.7%	34.8%	1.5%	-37.5%	-13.2%	21.0%
Total							
2000 Census	7,767	55.3%	2,246	16.0%	4,042	28.8%	14,055
2010 Census	11,385	71.0%	2,468	15.4%	2,182	13.6%	16,035
% Change 00–10	0.5%	15.7%	0.1%	-0.6%	-0.5%	-15.2%	0.1%

Incomplete plumbing or kitchen facilities are other indicators of potential housing problems. According to the Census Bureau, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. Likewise, a unit is categorized as deficient when any of the following are missing from the kitchen: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator.

As the number of households in the Commonwealth grew, the share of households living in units with incomplete plumbing facilities declined. Households are considered to have incomplete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. As shown in Table II.17 on the following page, around 16 percent of housing units had incomplete plumbing facilities in 2000, a share which had fallen below 14 percent by 2010.

Table II.17
Households with Incomplete Plumbing Facilities

Northern Mariana Islands
 2000 & 2010 Census Data

Households	2000	2010	% Change 00–10
With Complete Plumbing Facilities	11,754	13,824	17.6
Lacking Complete Plumbing Facilities	2,301	2,211	-3.9
Total Households	14,055	16,035	14.1
Percent Lacking	16.4%	13.8%	-15.8

Households living in these units also declined as a share of overall households on each of the major islands in the Commonwealth. However, this decline was most pronounced on Tinian, where the share of units with incomplete plumbing facilities fell from 25.3 to 15.4 over the decade, and Rota where the percentage of such units fell from 12.8 to 5.6 percent. Tables A.17.A, A.17.B, and A.17.C detail the extent of this housing problem on Saipan, Tinian, and Rota, respectively.

A larger percentage of households in the Commonwealth lacked complete kitchen facilities, as shown in Table II.18 below. Additionally, while the share of households with incomplete plumbing facilities had fallen considerably across the board, the percentage of households with incomplete kitchens increased. This housing problem impacted just over a fifth of housing units throughout the Commonwealth in 2010, but was more prevalent on Tinian and Rota. A unit is considered to have incomplete kitchen facilities when any of the following are missing from the kitchen: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator. Data detailing the lack of complete kitchen facilities on Saipan, Tinian, and Rota are presented in Tables A.18.A, A.18.B, and A.18.C, respectively.

Table II.18
Households with Incomplete Kitchen Facilities

Northern Mariana Islands
 2000 & 2010 Census Data

Households	2000	2010	% Change 00–10
With Complete Kitchen Facilities	11,273	12,698	12.6
Lacking Complete Kitchen Facilities	2,782	3,337	19.9
Total Households	14,055	16,035	14.1
Percent Lacking	19.8%	20.8%	5.1%

The third type of housing problem reported in the 2000 Census was cost burden, which occurs when a household has gross housing costs that range from 30 to 49.9 percent of gross household income; severe cost burden occurs when gross housing costs represent 50 percent or more of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent plus utility charges.

Unlike households experiencing overcrowding, incomplete plumbing facilities, or incomplete kitchen facilities, which generally declined as a share of Commonwealth households, the number and share of households that were cost-burdened increased between 2000 and 2010. As shown in Table II.19 on the following page, 15 percent of households throughout the Commonwealth were cost-burdened in 2000, meaning that housing costs took up 30 percent or more of the household income. By 2010 that figure had risen to 20.3 percent. This housing

problem tended to fall more heavily on homeowners with a mortgage: 26.1 percent of mortgagors were impacted by cost-burdening in 2000, a figure which had grown to 31.2 percent by 2010.

Table II.19
Cost Burden by Tenure

Northern Mariana Islands
2000 & 2010 Census

2000 & 2010 Census							
Data Source	Less Than 30%		30% and Above		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage							
2000	903	73%	322	26.1%	11	0.9%	1,236
2010	865	68%	397	31.2%	10	0.8%	1,272
Owner Without a Mortgage							
2000	2,568	91.2%	119	4.2%	129	4.6%	2,816
2010	2,835	86.8%	289	8.9%	141	4.3%	3,265
Renter							
2000	4,814	50.6%	1593	8.8%	3,099	32.6%	9,506
2010	5,920	51.5%	2,575	12.2%	3,003	26.1%	11,498
Total							
2000	8,285	61.1%	2,034	15.0%	3,239	23.9%	13,558
2010	10,457	65.2%	3,261	20.3%	3,154	19.7%	16,035

These trends were largely reflected on Saipan, Tinian, and Rota: On Saipan, a slightly larger share of households was cost-burdened than in the Commonwealth as a whole, as shown in Table A.19.A. Cost-burdened households accounted for a smaller share of households on Tinian than on Saipan or in the Commonwealth as a whole, as shown in Table A.19.B; however, cost-burdening was not computed for a relatively large share of households on Tinian. The same was true on Rota. However, as shown in Table A.19.C, households that were identified as being cost-burdened generally accounted for a smaller share of households on Rota than in the Commonwealth as a whole; the only exception was observed among mortgagors in 2000, some 31 percent of whom were cost-burdened in that year.

Renters with a severe cost burden are at risk of homelessness. Cost-burdened renters who experience one financial setback often must choose between rent and food or rent and health care for their families. Similarly, homeowners with a mortgage who have just one unforeseen financial constraint, such as temporary illness, divorce, or the loss of employment, may face foreclosure or bankruptcy. Furthermore, households that no longer have a mortgage yet still experience a severe cost burden may be unable to conduct periodic maintenance and repair of their homes, and in turn, may contribute to a dilapidation and blight problem. All three of these situations should be of concern to policymakers and program managers.

HOUSING COSTS

Housing costs fell throughout the Commonwealth between 2000 and 2010. As shown in Table II.20 at right, while the median contract rental price in 2000 was \$373, half of the population was paying \$216 or less in

Table II.20
Median Housing Costs

Northern Mariana Islands
2000 & 2010 Census Data

Housing Cost	2000	2010
Median Contract Rent	\$373	\$216
Median Home Value	\$159,800	\$123,800

contract rent¹⁶ by 2010. Similarly, the median value of owner-occupied housing units in the Commonwealth fell from \$159,800 in 2000 to \$123,800 by 2010. As shown in Table A.20.A, trends in housing cost were similar on Saipan, where median rental costs and home values were generally slightly higher than the overall median. The decline in housing costs was more dramatic on Tinian. As shown in Table A.20.B, the median contract rental cost on Tinian, \$13 higher than the overall median in 2000, had fallen to \$158 by 2010, \$58 below the overall median. Similarly, Tinian's median home value, which exceeded the Commonwealth median by \$2,400 in 2000, fell below the overall median by approximately the same amount over the following decade. Housing costs on Rota, lower than the overall median in both years, also fell considerably over the decade, as shown in Table A.20.C.

SUMMARY

Demographic

The total population of the Northern Mariana Islands fell considerably between 2000 and 2010, owing in large part to a decline in the number of residents aged 20 to 34. This decline marked a shift in the composition of the Northern Marianas population: In 2000, more than forty percent of residents were aged 20 to 34. By 2010, residents in that age range accounted for less than 18 percent of the Commonwealth population. By contrast, the islands saw marked growth in the number of residents aged 55 and older.

Over one quarter of the Commonwealth population resided in “group quarters” in 2000, or 17,791 residents. Most of these residents lived in “other institutional” settings, a category which includes worker dormitories. By 2010, the number of residents living in group quarters had fallen to 1,571 throughout the Commonwealth. It is probable that the group quarters population was composed primarily of workers in the textile industry, largely migrant laborers from China and other Asian countries. Excluding these residents from population figures suggest that the population living in households actually increased, from 51,430 in 2000 to 52,312 in 2010.

The racial and ethnic composition of the population changed between 2000 and 2010: this was most pronounced in the marked increase in the number of residents who identified themselves as belonging to two or more racial/ethnic groups. From 4.8 percent of the population in 2000, the multi-racial/ethnic population grew to 12.7 percent by 2010, more than doubling in number in the process. Asian residents constituted a majority of the single-race/single-ethnicity (SRSE) population in both years; however, the number of Asian residents fell by 30.9 percent over the decade. The decline in population was slower among Native Hawaiian/Pacific Islander residents, who represented a larger share of the SRSE population in 2010 than they had in 2000. Among Native Hawaiian/Pacific Islander residents, 68.6 percent were Chamorro, and 13.1 percent were Carolinian. Among Asian residents, 70.7 percent were Filipino, and 13.6 percent were Chinese.

Geographically, Asian residents tended to make up larger shares of the population in Census block groups on the west coast of Saipan and around central San Jose on Tinian. The Native Hawaiian/Pacific Islander population, on the other hand, represented larger shares of the

¹⁶ Contract rent does not include charges in addition to rent, such as utilities, water, etc.

population in eastern block groups on Saipan, rural areas of Tinian, and throughout the island of Rota. The highest concentrations of residents who identified themselves as multi-racial/ethnic appeared in northern and eastern block groups on Saipan.

Around 14 percent of the Commonwealth population was counted as living with some form of disability in 2000. The highest concentrations of residents with disabilities were observed in block groups along the western coast of Saipan, where as much as 57.7 percent of the population was living with a disability. Similar concentrations of residents with disabilities were not observed in 2010, when residents with disabilities accounted for 5.5 percent of the population overall. It should be noted that the Census questionnaire from 2010 differed considerably from that of the 2000 Census where disability is concerned. For that reason, the Census Bureau discourages direct comparisons between the two: it would not be correct to conclude, for example, that the share of residents with disabilities actually declined from 14 to 5.5 percent, since those two figures are based on substantively different criteria for who is to count as living with a disability.

Economics

Even as the overall population declined, and with it the size of the Commonwealth labor force, the number and share of workers who were unemployed rose considerably. Around 4 percent of people in the labor force were unable to find work in 2000, or 1,712 workers. By 2010, the number of workers who were unable to find employment had risen to 3,123, representing 11.2 percent of the labor force. This overall trend was not reflected on Tinian, where the unemployment rate fell slightly over the decade. Though female workers were less likely than their male counterparts to be unemployed in 2000, growth in the unemployment rate was considerably more rapid among female workers. By 2010, some 13 percent of the female labor force in the Commonwealth was unemployed.

The decade between 2000 and 2010 saw the collapse of the Commonwealth's manufacturing sector. In 2000, more than 17,000 Northern Mariana residents worked in manufacturing, or 40.7 percent of the working population. By 2010, fewer than 700 workers had manufacturing jobs, or 2.8 percent of the working population. The largest industry in the Commonwealth in 2010, in terms of employment, was the arts, entertainment, and food services industry, which accounted for 22.2 percent of the jobs in the CNMI, followed by the educational, health, and social services industry, which provided 12.4 percent of jobs.

As the Commonwealth's labor force declined and the overall unemployment rate rose, higher-income households came to account for a smaller share of households overall. The percentage of households earning \$30,000 per year or more fell from 40.2 to 35 percent. At the same time, the share of households earning less than \$25,000 per year rose by around five percentage points. These trends were generally reflected on the islands individually, though Tinian saw an increase in the percentage of households in the low- to middle-income range, with declines the shares of households at the low and high ends of the income range.

The overall poverty rate rose between 2000 and 2010, from 46 to 52.3 percent. The highest geographic concentrations of residents living in poverty were observed on the west coast of Saipan, particularly in and around Susupe, Lower Base, and Puerto Rico. Poverty rates tended to be lower on Tinian and Rota, though there were above-average concentrations of

impoverished households in and around Songsong, along with San Jose on Tinian. In 2010, block groups on the west coast of Saipan continued to hold relatively high concentrations of residents living in poverty.

Housing

More than two-thirds of occupied housing units were occupied by rental tenants in 2000, a share that grew to 71.7 percent over the following decade. The Commonwealth housing stock grew more rapidly than the number of households between the 2000 and 2010 Census counts, resulting in a higher vacancy rate at the end of the decade: 23.1 percent in 2010, up from 20 percent in 2000. A majority of vacant units were available for rent in both years. However, a relatively large share of units were classified as “other vacant”, and this share grew from 31.4 to 33.5 percent of all vacant units between 2000 and 2010. “Other vacant” units tend to be more problematic than other types of housing units, as they are not available to the marketplace and may contribute to blight where they are grouped in close geographic proximity. In 2010, the areas around Kagman had relatively high concentrations of “other vacant” units.

Though a majority of housing units in the Commonwealth were single-family units, the share of apartment units grew from 26.4 to 32 percent from 2000 through 2010 as 2,034 units were added to the housing stock. Meanwhile, single-family units declined as a share of the housing stock, from 62.3 to 58.1 percent.

The average household size declined between the 2000 and 2010 Censuses, from 3.66 persons per household to 3.26, while the number of households in the Commonwealth grew. Smaller households, i.e., those with less than five members, increased in number and as a share of all housing units in the Commonwealth as a whole, while households with five or more members represented a smaller percentage of Commonwealth households at the end of the decade.

As households decreased in size, over-crowding generally became less common. Housing units are considered overcrowded when they included between 1 and 1.5 members per room; severely overcrowded when they include more than 1.5 members per room. Around 15.4 percent of housing units were overcrowded in 2010, down from 16 percent in 2000. At the same time, the percentage of housing units that were severely overcrowded fell by half, from 28.8 to 13.6 percent.

The percentage of households lacking complete plumbing facilities also fell over the decade, from 16.4 percent of all housing units to 13.8 percent. Households are considered to have incomplete plumbing facilities when they are missing piped hot and cold water, a flush toilet, or a bathtub or shower.

Unlike housing units with incomplete plumbing facilities, those with incomplete kitchen facilities made up a larger share of housing units in 2010 than in 2000. Kitchen facilities are considered incomplete when any of the following are missing from the unit: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator. Just over a fifth of housing units lacked complete kitchen facilities in 2010, up a percentage point from 2000.

Homeowners and renters were more likely to be cost-burdened in 2010 than they had been in 2000. Households are considered to be cost burdened when more than 30 percent of their income goes toward housing costs. In 2000, some 26.1 percent of mortgagors were cost-burdened, along with 8.8 percent of renters. By 2010, those shares had grown to 31.2 and 12.2 percent, respectively. Some 3,261 households were observed to be cost-burdened in that year. This increased incidence of cost-burdening came in spite of a marked drop in housing costs after 2000.

SECTION III. FAIR HOUSING LAW, STUDY, AND CASE REVIEW

As part of the AI process, existing fair housing laws, studies, cases, and other relevant materials were reviewed on a national and local scale. Results of this review are presented below.

FAIR HOUSING LAWS

FEDERAL FAIR HOUSING LAWS

Federal laws provide the backbone for U.S. fair housing regulations. While some laws have been previously discussed in this report, a brief list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD's) website, is presented below:

Fair Housing Act. Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18), and handicap (disability).¹⁷

Title VIII was amended in 1988 (effective March 12, 1989) by the *Fair Housing Amendments Act* . . . In connection with prohibitions on discrimination against individuals with disabilities, the Act contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.¹⁸

Title VI of the Civil Rights Act of 1964. Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance.

Section 504 of the Rehabilitation Act of 1973. Section 504 prohibits discrimination based on disability in any program or activity receiving Federal financial assistance.

Section 109 of the Housing and Community Development Act of 1974. Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development and Block Grant Program.

Title II of the Americans with Disabilities Act of 1990. Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

¹⁷ "HUD Fair Housing Laws and Presidential Executive Orders."

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws

¹⁸ "Title VIII: Fair Housing and Equal Opportunity."

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/progdesc/title8

Architectural Barriers Act of 1968. The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain Federal funds after September 1969 be accessible to and useable by handicapped persons.

Age Discrimination Act of 1975. The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving Federal financial assistance.

Title IX of the Education Amendments Act of 1972. Title IX prohibits discrimination on the basis of sex in education programs or activities that receive Federal financial assistance.¹⁹

COMMONWEALTH FAIR HOUSING LAWS

In addition to laws at the Federal level, the Commonwealth's own Fair Housing Act ("Commonwealth FHA") prohibits discrimination in the housing market on the same bases identified in the Federal FHA, as well as discrimination on the basis of marital status.²⁰

ARTICLE XII OF THE NORTHERN MARIANAS CONSTITUTION

Article XII of the Commonwealth Constitution limits the acquisition of "permanent and long-term interests in real property" in the Northern Mariana Islands to persons of Northern Marianas descent. For the purposes of this Article, "persons of Northern Marianas descent" (NMDs) are United States citizens who have "at least some degree of Northern Marianas Chamorro or Northern Marianas Carolinian blood."²¹

This Article of the Commonwealth Constitution was identified as an impediment to fair housing choice in the 2006 Analysis of Impediments to Fair Housing Choice for Rota, Tinian, and Saipan. However, Article XII was amended by House Legislative Initiative 18-1 in 2014, which reduced the degree of Northern Marianas Chamorro or Carolinian blood required for a person to be considered to be "of Northern Marianas descent" from one-quarter to "at least some degree", in principle making homeownership available to more Commonwealth residents in accordance with the goals set forth in the 2006 AI. In addition, because it is the stated intent of the Commonwealth Fair Housing Act to provide for fair housing protections "within constitutional limitations²²", and Article XII represents a constitutional limitation on housing choice, the requirements concerning NMD in homeownership are considered to be in keeping with the Commonwealth Fair Housing Act and are not identified here as impediments.

PUBLIC LAW 15-20 (2006)

In recognition that Article XII contributed to the underdevelopment of retirement housing in the Northern Marianas, the Commonwealth Legislature passed Public Law 15-20 in 2006. The purpose of this law was to make it possible for people who are not of Northern Marianas descent to own a long-term interest in condominium units, provided that those units are

¹⁹ "HUD Fair Housing Laws and Presidential Executive Orders."

²⁰ 2 CMC §40101 et seq

²¹ N.M.I. Const. art. XII

²² Public Law 11-30

located above the ground floor of a condominium development. Long-term ownership of ground floor units remains reserved for residents of Northern Marianas descent.²³

FAIR HOUSING IN THE UNITED STATES

THE FIRST FORTY YEARS OF THE FAIR HOUSING ACT

The Fair Housing Act of 1968 was a product of the tumultuous time in which it was passed. Coming near the end of a decade marked by concerted and often violent struggles for civil rights, it was a profound statement of a nation's commitment, despite considerable reluctance in many quarters, to work toward the end of segregation by race, color, religion, sex, and national origin. It was also, upon its passage, a relatively weak law: another sign of the social and political context in which it was passed. It was only after the enforcement provisions of the Act were considerably blunted that it was able to secure enough support to ensure its passage.²⁴

Due in part to the weakening of those enforcement provisions, the Act was initially of only limited effectiveness in eradicating residential segregation, one of the policy goals that motivated passage of the law. According to one analyst, the first two decades of the Fair Housing Act constitute a "lost opportunity in terms of race relations in the United States"²⁵. Nevertheless, the period following the passage of the Act was marked by a "minority rights revolution"²⁶, whose germinal moment was the movement for civil rights for black Americans. This revolution was soon expanded to encompass the drive for equality for women, ethnic minorities, gays and lesbians, and the disabled.²⁷ The civil rights movement had a limited impact on residential segregation, however, which has persisted since 1968 due in part to persistent discrimination in the housing market^{28 29}

However, the cultural shifts of the late twentieth century helped to pave the way for passage of the Fair Housing Amendments Act of 1988, which broadened the enforcement provisions of the Act, gave increased authority to the US Department of Housing and Urban Development (HUD) to administer and enforce fair housing law, and increased the penalties to those who violated the act.³⁰ In addition, reflecting the impact of advocacy on behalf of those with disabilities as well as marked changes to the traditional family structure over the previous two decades³¹, the 1988 law added new protections based on "handicap" and "familial status."

²³ Northern Marianas Public Law 15-20

²⁴ Denton, Nancy A. *Half Empty or Half Full: Segregation and Segregated Neighborhoods 30 Years After the Fair Housing Act*. Cityscape: A Journal of Policy Development and Research, 1999. Vol. 4, No. 3. P. 111.

²⁵ *Ibid.*

²⁶ Skrentny 2002. *The Minority Rights Revolution*. Harvard University Press, 2004.

²⁷ Marsden, Peter V. *Social Trends in American Life: Findings from the General Social Survey since 1972*.

²⁸ Denton 1999.

²⁹ Yinger, John. *Measuring Racial Discrimination with Fair Housing Audits: Caught in the Act*. The American Economic Review, Vol. 76, No. 5: 1986. P. 881. This study, based on the results of paired fair housing tests in the city of Boston, concluded that housing agents, in "[catering] to the prejudices of current or potential white customers", told black housing seekers about 30 percent fewer available housing units. A similar methodology was employed in a 2012, which demonstrated the persistence of this form of discrimination (See "Housing Discrimination Against Racial and Ethnic Minorities 2012," published by the US Department of Housing and Urban Development).

³⁰ Denton 1999.

³¹ Marsden 2008

The ten years following the passage of the 1988 amendments saw an increase in the number of fair housing complaints filed with HUD, as well as an evolution in housing discrimination to a form that was, in the estimation of former HUD Secretary Andrew Cuomo, “more sophisticated, less obvious, but more insidious.”³² An example of such segregation was to be found, according to a 1999 HUD study, in the home lending market. That study, which was based on the results of paired testing of home mortgage lenders in selected cities, concluded that minority applicants were given less time with loan officers than non-minority applicants, received less information on prospective loan products, and were quoted higher interests rates in most of the cities included in the study. This differential treatment occurred in spite of the fact that the paired testers represented themselves as being similarly situated with respect to credit history and other relevant characteristics.³³

It was not clear in the late 1990s whether HUD’s increasing fair housing case load was the result of increasing segregation or growth in the number of US residents taking advantage of newly expanded fair housing enforcement measures. To help answer this question, HUD conducted a massive three-part study of discrimination in metropolitan housing markets, publishing the results of the first phase in 2000. In the course of the study HUD, once again availing itself of the paired testing employed in earlier studies, demonstrated the persistence of housing discrimination on the basis of race and ethnicity and its continuation into the twenty-first century. As in the 1999 study on mortgage lending, the HUD report revealed that minority housing seekers were, on average, shown fewer units and given fewer housing options than their majority counterparts, even when similarly situated with respect to their financial status.³⁴ These findings were reinforced by a study conducted jointly by the University of Southern California and Oregon State University on the Los Angeles County housing market in 2006.³⁵

Recent Trends in Fair Housing Law and Policy

Released by the Poverty & Race Research Action Council in January 2008, *Residential Segregation and Housing Discrimination in the United States* asserts that many current governmental efforts to further fair housing actually result in furthering unfair housing practices across the U.S. This article suggests that fair housing efforts can cause residential segregation. For example, if the majority of public housing residents are non-white and most public housing accommodations are grouped in the same Census tracts, residential segregation is resultant. Similarly, many Section 8 voucher holders are racial or ethnic minorities, and most housing that accepts Section 8 vouchers is grouped in selected areas, which again results in residential segregation. The report offers recommendations to curb such residential segregation, including dispersing public housing developments throughout cities and communities and providing greater incentives for landlords with several properties to accept the vouchers.³⁶

Published in 2009 by the National Fair Housing Alliance, *For Rent: No Kids!: How Internet Housing Advertisements Perpetuate Discrimination* presented research on the prevalence of discriminatory housing advertisements on popular websites such as Craigslist. According to the article, while newspapers are prohibited from publishing discriminatory housing

³² Janofsky, Michael. “HUD Plans Nationwide Inquiry on Housing Bias.” *The New York Times*, 17 November 1998.

³³ Turner, Margery A. et al. “What We Know About Mortgage Lending Discrimination in America”. The Urban Institute. September 1999.

³⁴ *The Housing Discrimination Study*. Department of Housing and Urban Development. (HDS 2000).

³⁵ Carpusor, Adrian and William Loges. “Rental Discrimination and Ethnicity in Names.” *Journal of Applied Social Psychology* 36(4).

³⁶ U.S. Housing Scholars and Research and Advocacy Organizations. *Residential Segregation and Housing Discrimination in the United States*. January 2008. <http://prarc.org/pdf/FinalCERDHousingDiscriminationReport.pdf>

advertisements, no such law exists for websites like Craigslist, as they are considered interactive internet providers rather than publishers of content. As such, they are not held to the same legal standards as newspapers. While individual landlords who post discriminatory advertisements may be held responsible, there are no such standards for companies like Craigslist that post the discriminatory advertisements. Newspapers and other publishers of content are required to screen the advertisements they accept for publishing for content that could be seen as discriminatory. This may include phrases like “no children” or “Christian only,” which violate provisions of the Fair Housing Act that state families with children and religious individuals are federally protected groups.³⁷

In May 2010, the National Fair Housing Alliance published a fair housing trends report, *A Step in the Right Direction*, which indicated that recent years have demonstrated forward movement in furthering fair housing. The report began with a commendation of HUD’s Federal enforcement of fair housing law and noted the agency’s willingness to challenge local jurisdictions that failed to affirmatively further fair housing. In response to the recent foreclosure crisis, many credit institutions have implemented tactics to reduce risk. However, this report suggests that policies that tighten credit markets, such as requiring larger cash reserves, higher down payments, and better credit scores, may disproportionately affect lending options for communities of color and women. *A Step in the Right Direction* concludes with examples of ways in which the fair housing situation could be further improved, including addressing discriminatory internet advertisements and adding gender identity, sexual orientation, and source of income as federally protected classes.³⁸

The positive note that the NFHA struck in its 2010 report carried over into the following year’s *The Big Picture: How Fair Housing Organizations Challenge Systemic and Institutionalized Discrimination*, published by the Alliance in April of 2011. This report began by noting an encouraging downward trend in the proportion of individuals in large metropolitan areas living in segregation, which had dropped from 69 to 65 percent between 2000 and 2010, according to census data from 2010. The report also highlighted the work of fair housing organizations to combat systemic and institutionalized discrimination produced by exclusionary zoning, NIMBYism, the dual credit market, and other fair housing challenges, often on limited budgets and with limited personnel. The NFHA closed its 2011 report by praising the work of private fair housing organizations while underscoring the need for continued work.³⁹

The 2012 report from the NFHA focused on issues of fair housing in the context of the shifting demographic composition of the United States, where the white population is projected to no longer represent a majority of residents within thirty years. The report discussed encouraging signals from HUD and the Justice Department, who have “increased their efforts and announced landmark cases of mortgage lending, zoning, and other issues that get to the heart of the [Fair Housing] Act: promoting diverse and inclusive communities⁴⁰.” The report also highlights a new arena for discrimination in housing, which has emerged as a result of the

³⁷ National Fair Housing Alliance. *For Rent: No Kids!: How Internet Housing Advertisements Perpetuate Discrimination*. August 2009. <http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=zgbukJP2rMM%3D&tabid=2510&mid=8347>

³⁸ National Fair Housing Alliance. *A Step in the Right Direction: 2010 Fair Housing Trends Report*. May 2010. <http://www.nationalfairhousing.org/Portals/33/Fair%20Housing%20Trends%20Report%202010.pdf>

³⁹ *The Big Picture: How Fair Housing Organizations Challenge Systemic and Institutionalized Discrimination*. National Fair Housing Alliance 2011 Fair Housing Trends Report. 29 April 2011.

<http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=SbZH3pTEZhs%3d&tabid=3917&mid=5321>

⁴⁰ <http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=GBv0ZVJp6Gg%3d&tabid=3917&mid=5321>

massive level of foreclosures in the country in recent years: uneven maintenance of Real Estate Owned (REO) properties in white and minority areas. In concluding, the report hails the creation of the Consumer Financial Protection Bureau as a new ally for fair housing and equal opportunity.⁴¹

However, even as the 2012 NFHA underscored maintenance of foreclosed properties as a nascent form of housing discrimination, a HUD report issued in the following year demonstrated the persistence of more traditional forms of discrimination. Echoing the results of earlier paired tests for housing discrimination, the study demonstrated that where differences in the treatment of minority and white housing seekers occur, it is the white housing seekers who are more likely to benefit from such differential treatment. However, on an encouraging note, the study also demonstrated that well-qualified buyers are generally equally likely to get an appointment to hear about at least one available unit, regardless of race.⁴²

The 2013 from the NFHA outlines an ambitious policy goal: expansion of the Fair Housing Act to prohibit discrimination based on source of income, sexual orientation, gender identity, and marital status. The report relates that cases of housing discrimination in general increased between 2011 and 2012, and that complaints based on non-protected statuses (source of income, etc.) were included in that upward trend. In spite of this, only 12 states included protections based on source of income when the report was published; 21 states prohibited discrimination based on sexual orientation, sixteen states protected against discrimination based on gender identity, and 22 states offered protections based on marital status (the District of Columbia also extended protections on all of these bases). In concluding the report, the NFHA advocates the modernization and expansion of the FHA to bring the protection of individuals based on source of income, sexual orientation, gender identity, and marital status within its compass.

In its 2014 Fair Housing trends report, entitled “Expanding Opportunities: Systemic Approaches to Fair Housing”, the NFHA began by lauding the efforts of HUD, DOJ, and private non-profit fair housing organizations for their efforts over the prior year in promoting fair housing choice across the United States. The report also noted an increase in the number of fair housing complaints relating to real estate sales, homeowner’s insurance, and housing advertisements, even as the overall number of housing complaints remained relatively steady. The 2014 report also featured a regional analysis of housing discrimination complaints, which indicated that complaints of housing discrimination were more common in the more racially and ethnically segregated metropolitan statistical areas of the country.⁴³

A CHANGING FAIR HOUSING LANDSCAPE

NATIONAL FAIR HOUSING CASES

As noted in the introduction to this report, provisions to affirmatively further fair housing (AFFH) are long-standing components of HUD’s Housing and Community Development programs. In fact, in 1970, *Shannon v. HUD* challenged the development of a subsidized low-

⁴¹ *Ibid.*

⁴² Turner, Margery A. et al. “Housing Discrimination Against Racial and Ethnic Minorities 2012.” The Urban Institute. June 2013.

⁴³ *Expanding Opportunity: Systemic Approaches to Fair Housing*. National Fair Housing Alliance. August 13, 2014.

income housing project in an urban renewal area of Philadelphia that was racially and economically integrated. Under the Fair Housing Act, Federal funding for housing must further integrate community development as part of furthering fair housing, but the plaintiffs in the Shannon case claimed that the development would create segregation and destroy the existing balance of the neighborhood. As a result of the case, HUD was required to develop a system to consider the racial and socio-economic impacts of their projects.⁴⁴ The specifics of the system were not decided upon by the court, but HUD was encouraged to consider the racial composition and income distribution of neighborhoods, racial effects of local regulations, and practices of local authorities.⁴⁵ The Shannon case gave entitlement jurisdictions the responsibility of considering the segregation effects of publicly-funded housing projects on their communities as they affirmatively further fair housing.

More recently, in a landmark fraud case, Westchester County, New York, was ordered to pay more than \$50 million to resolve allegations of misusing Federal funds for public housing projects and falsely claiming their certification of affirmatively furthering fair housing. The lawsuit was filed in 2007 by the Anti-Discrimination Center (ADC), a New York-based non-profit organization, under the False Claims Act. According to the ADC, the County “failed to consider race-based impediments to fair housing choice; failed to identify and take steps to overcome impediments; and failed to meet its obligations to maintain records concerning its efforts.”

In a summary judgment in February 2009, a judge ruled that the County had made “false certifications on seven annual AFFH certifications and on more than a thousand implied certifications of compliance when it requested a drawdown of HUD funds”. Pursuant to a settlement agreement brokered by the Obama Administration in April 2009, Westchester County was required to pay more than \$30 million to the Federal government, with roughly \$20 million eligible to return to the County to aid in public housing projects. The County was also ordered set aside \$20 million to build public housing units in suburbs and areas with mostly white populations, and to promote legislation “currently before the Board of Legislators to ban ‘source-of-income’ discrimination in housing”.⁴⁶

Finding that Westchester had failed to affirmatively further fair housing in the manner agreed upon in the earlier settlement, HUD rejected the County’s AFFH certification and discontinued Federal funding in 2011. The case is likely to have ramifications for entitlement communities across the nation; activities taken to affirmatively further fair housing will likely be held to higher levels of scrutiny to ensure that Federal funds are being spent to promote fair housing and affirmatively further fair housing. The case also signals an increased willingness on the part of HUD to bring enforcement pressure to bear in order to insure that state, local, and insular jurisdictions comply with the AFFH requirements.

Affirmatively Furthering Fair Housing

At the same time that HUD has pursued a more active role in fair housing enforcement, the agency has sought to bring additional guidance and clarity to fair housing policy. This effort

⁴⁴ U.S. HUD. *39 Steps Toward Fair Housing*. <http://www.hud.gov/offices/fheo/39steps.pdf>

⁴⁵ Orfield, Myron. “Racial Integration and Community Revitalization: Applying the Fair Housing Act to the Low Income Housing Tax Credit.” *Vanderbilt Law Review*, November 2005.

⁴⁶ <http://www.hud.gov/content/releases/settlement-westchester.pdf>

was inspired in part by the agency's own assessment of shortcomings in current policy and in part by criticism from other agencies; notably the Government Accountability Office (GAO).⁴⁷

In 2009, HUD noted that many of the AIs it reviewed as part of an internal study did not conform to the agency's guidelines. This finding was reaffirmed in a 2010 study conducted by the GAO, which sought to assess the effectiveness of Analyses of Impediments as a tool to affirmatively further fair housing, as well as their effectiveness as planning documents. According to the GAO, an estimated 29 percent of CDBG and HOME grantees' AIs were prepared in 2004 or earlier, and were therefore likely to be of limited usefulness in current planning efforts. Furthermore, the GAO found that those AIs that were up to date largely lacked features that would render them more effective as planning documents, including timetables and the signatures of top elected officials. More generally, the GAO noted that HUD guidelines concerning AIs are unclear, and that its requirements for the analyses are minimal⁴⁸. Under those requirements, the agency observed, grantees are "not required through regulation to update their AIs periodically, include certain information, follow a specific format in preparing AIs, or submit them to HUD for review⁴⁹."

The conclusion of the GAO study is reflected in its title: *HUD Needs to Enhance Its Requirements and Oversight of Jurisdictions' Fair Housing Plans*. In response to the criticism of the GAO, as well as a longstanding recognition on the part of HUD that fair housing policy stood in need of improvement and clarification, the agency developed and published a proposed rule entitled *Affirmatively Furthering Fair Housing* in July of 2013. The proposed rule represents a substantial restructuring of the AFFH process, eliminating the AI and replacing it with the Assessment of Fair Housing (AFH). According to the rule, the AFH will (1) incorporate key demographic and econometric metrics specifically identified by HUD, (2) be completed with nationally uniform data provided by HUD, and (3) be submitted to HUD for review in advance of the consolidated plan to insure that the findings of the fair housing analysis are fully integrated into the consolidated planning process.⁵⁰ The comment period for the proposed rule ended in September of 2013. The final rule was announced on July 8, 2015 and published on July 16, 2015.

The final rule has four main goals:

1. Improve integrated living patterns and overcome historic patterns of segregation;
2. Reduce or eliminate racially and ethnically concentrated areas of poverty;
3. Reduce disparities in access to community assets such as education, transit access, employment, as well as exposure to environmental health hazards and other stressors that harm a person's quality of life; and
4. Address disproportionate housing needs by protected classes.

The new requirements set forth in the rule will not take effect immediately, and will be phased in beginning in 2016. Entitlement jurisdictions will be required to begin submitting Assessment of Fair Housing as early as April of 2016. The earliest that a state or insular area will be

⁴⁷ 24 CFR §5, 91, 92, et al. (2013)(Proposed Rule)

⁴⁸ "HUD Needs to Enhance Its Requirements and Oversight of Jurisdictions' Fair Housing Plans". *Government Accountability Office*. September 2010.

⁴⁹ *Ibid.*, page 32.

⁵⁰ 24 CFR §5, 91, 92, et al. (2013)(Proposed Rule)

required to submit an AFH is April of 2017. The current AI effort is being undertaken in conformance with HUD guidance that is currently in place, as articulated in the Fair Housing Planning Guide, subsequent memoranda, and as required by the AFFH rule itself.

Discriminatory Effects and the Fair Housing Act

In addition to the AFFH rule, HUD finalized a rule in February 2013 that was intended to “formalize HUD’s long-held interpretation of the availability of ‘discriminatory effects’ liability under the Fair Housing Act⁵¹.” According to HUD, individuals and businesses may be held liable for policies and actions that are neutral on their face but have a discriminatory effect on housing choice. This theory of liability had not yet been articulated by the signing of the Civil Rights Acts of 1964 or 1968; however, it has been an important test for discrimination in employment since the Supreme Court found in 1971⁵² that the Civil Rights Act “proscribes not only overt discrimination but also practices that are fair in form, but discriminatory in operation⁵³.”

The first test of “disparate impact theory” in housing law came in 1974, with *United States v. City of Black Jack*⁵⁴. In that case, the government alleged that the City of Black Jack had “exercised its zoning powers to exclude... a federally-subsidized housing development”, thereby excluding residents of low-income housing, who were disproportionately black.⁵⁵ In deciding the matter, the Eighth Circuit Court maintained that a plaintiff “need prove no more than that the conduct of the defendant actually or predictably results in racial discrimination” to make a case that the conduct is itself discriminatory⁵⁶.

The theory of discriminatory effect established in this case has been consistently applied in fair housing cases and upheld in numerous district court decisions.⁵⁷ However, disparate impact theory was to face a considerable legal challenge in early 2015 in the case of *Texas Department of Housing and Community Affairs v. The Inclusive Communities Project*. In this case, the Supreme Court of the United States was asked to finally settle the question of whether or not housing providers and policy makers could be held liable not just for intentional discrimination, but for the effects of neutral policies that produce discriminatory outcomes.

⁵¹ 24 CFR §100 (2013)

⁵² Garrow, David J. “Toward a Definitive History of *Griggs v. Duke Power Company*”. 67 Vand. L. Rev. 197 (2014).

⁵³ *Griggs v. Duke Power Co.*, 401 U.S. 430 (1971).

⁵⁴ Rich, Joseph D. “HUD’s New Discriminatory Effects Regulation: Adding Strength and Clarity to Efforts to End Residential Segregation.” Lawyers’ Committee for Civil Rights Under Law. May 2013.

⁵⁵ *United States v. City of Black Jack, Missouri*, 508 F.2d 1179, 1184 (8th Cir. 1974)

⁵⁶ *Ibid.*

⁵⁷ 24 CFR §100 (2013); Rich, Joseph D. “HUD’s New Discriminatory Effects Regulation: Adding Strength and Clarity to Efforts to End Residential Segregation.” Lawyers’ Committee for Civil Rights Under Law. May 2013.

Texas Department of Housing and Community Affairs v. The Inclusive Communities Project

In 2008, a Dallas-based non-profit organization called the Inclusive Communities Project (“the Project”) sued the Texas Department of Housing and Community Affairs (“the Department”), claiming that the point system by which it allocates Federal tax subsidies serves to concentrate subsidized housing in low-income communities.⁵⁸ In the lawsuit, the Project relied in part on disparate impact theory, which had been established through decades of jurisprudence but upon which the Supreme Court had, at the time, never definitively ruled.

According to the Project, the Department disproportionately allocated low-income housing tax credits in minority areas while denying those credits in predominantly white communities. In addition to the direct effect of concentrating units subsidized through these tax credits, the Project alleged that this manner of allocation led to the further concentration of Section 8 Housing in those same areas⁵⁹, which served to limit housing options for low-income, minority residents to areas with high concentrations of racial minority residents.⁶⁰ In its original complaint, the Project argued both that the point scheme was intentionally discriminatory and that it produced a disparate impact on minority residents. The District Court for the Northern District of Texas found that the Project had failed to prove intentional discrimination but had proved its disparate impact claim.

Having been upheld in the U.S. Court of Appeals for the Fifth Circuit, the matter then moved to the Supreme Court at the request of the Department.⁶¹ In asking the Supreme Court to consider the case, the Department presented the court with two questions: First, “are disparate-impact claims cognizable under the Fair Housing Act?”⁶² In other words, does the Act permit disparate-impact claims? Second, in the event that the Court finds that the FHA does allow such claims, the Department also asked “what are the standards and burdens of proof that should apply?”⁶³ The Court’s decision on this matter, handed down on June 25, 2015, upheld the availability of discriminatory effects liability under the Fair Housing Act.⁶⁴

Recent U.S. Department of Justice Cases

The U.S. Department of Justice (DOJ) enacts lawsuits on behalf of individuals based on referrals from HUD. Under the Fair Housing Act, the DOJ may file lawsuits in the following instances:

- Where there is reason to believe that a person or entity is engaged in what is termed a “pattern or practice” of discrimination or where a denial of rights to a group of people raises an issue of general public importance;
- Where force or threat of force is used to deny or interfere with fair housing rights; and

⁵⁸ *Inclusive Communities Project v. Texas Department of Housing and Community Affairs* (2014).

⁵⁹ *Ibid.* Section 8 housing vouchers, which are often not accepted by private landlords, cannot be turned down by those who receive low income housing tax credits.

⁶⁰ *Ibid.*

⁶¹ Howe, Amy. “Will the third time be the charm for the Fair Housing Act and disparate-impact claims? In Plain English.” Supreme Court of the United States Blog. January 6, 2015. Accessible at “<http://www.scotusblog.com/2015/01/will-the-third-time-be-the-charm-for-the-fair-housing-act-and-disparate-impact-claims-in-plain-english/>”

⁶² *Texas Department of Housing and Community Affairs v. The Inclusive Communities Project* (2014). Petition for a Writ of Certiorari.

⁶³ *Ibid.*

⁶⁴ *Texas Department of Housing and Community Affairs v. The Inclusive Communities Project* (2015)

- Where persons who believe that they have been victims of an illegal housing practice file a complaint with HUD or file their own lawsuit in Federal or state court.⁶⁵

The Department of Justice has not filed any fair housing cases against housing providers in the Commonwealth in the last ten years.

SUMMARY

Residents of the Northern Mariana Islands are protected from discrimination in the housing market by Federal and Commonwealth laws. The Federal Fair Housing Act provides the foundation for fair housing enforcement throughout the United States and its insular areas, prohibiting discrimination in a wide range of housing transactions on the basis of race, color, religion, national origin, sex, familial status, and disability. The CNMI also prohibits discrimination on these same bases in the Commonwealth Fair Housing Law, as well as discrimination on the basis of marital status.

Housing choice in the Northern Mariana Islands is also shaped by Article XII of the Commonwealth Constitution. This article, passed in recognition of “the importance of the ownership of land for the culture and tradition of the people of the Northern Mariana Islands⁶⁶”, as well as to prevent their exploitation and promote their economic self-sufficiency, prohibits any resident without Carolinian or Chamorro ancestry from owning a long-term interest in real property on the islands. The restrictions of this article were considerably relaxed with the adoption of House Legislative Initiative in 2014: Prior to this initiative, only those who were at least one-quarter Chamorro or Carolinian were eligible to own land. At present, prospective land-owners must possess “some degree” of Chamorro or Carolinian blood.

In addition, Public Law 15-20, passed in 2006, made it possible for residents who are not of Northern Marianas descent to purchase long-term interest in housing units, provided that they are condominium units located above the ground floor.

Housing law and jurisprudence has evolved considerably since the FHA was first enacted in 1968. The Fair Housing Amendments Act of 1988 added additional protections, strengthened the Act’s relatively weak enforcement provisions, and gave the Department of Housing and Urban Development enhanced authority to enforce the Act. In addition, since the early 1970s the FHA has consistently been interpreted to apply to laws and policies that are apparently neutral with respect to protected class status, but which nevertheless “actually or predictably⁶⁷” result in discrimination. In 2013, HUD finalized a rule formalizing its interpretation of discriminatory effects liability under the FHA.

That interpretation was reaffirmed in a June 25, 2015 Supreme Court decision in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.* That case originated in a lawsuit against the Texas Department of Housing and Community Affairs (“the Department”) on the grounds that the process by which it awarded low income housing tax credits had the effect of concentrating affordable housing in areas with high concentrations

⁶⁵ “The Fair Housing Act.” The United States Department of Justice. http://www.justice.gov/crt/about/hce/housing_coverage.php

⁶⁶ See *N.M.I. Const. art. XII* and House Legislative Initiative 18-1 (2014)

⁶⁷ *United States v. City of Black Jack, Missouri*, 508 F.2d 1179, 1184 (8th Cir. 1974) It was racial discrimination, specifically, that was at issue in this case.

of minority residents. In bringing the suit, the Inclusive Communities Project relied in part on the disparate impact theory, and it was that theory that the Department sought to challenge in asking the Supreme Court to hear the case. Ultimately, the Court held that individuals, businesses, and government agencies could be held liable for the disparate impacts of their policies.

Following on the heels of the Supreme Court decision, HUD announced a final rule significantly revamping its long-standing requirement to affirmatively further fair housing (AFFH). In developing and finalizing this rule, HUD has substantially revised the AFFH process by (1) replacing the analysis of impediments with the assessment of fair housing (AFH), (2) integrating fair housing planning into the consolidated planning process, and (3) providing a fair housing assessment tool and nationally standardized datasets, among other changes. Generally speaking, the new rule will apply to local entitlement jurisdictions that are due to begin their next five-year planning cycle in 2017 or later. For smaller entitlement jurisdictions, as well as states and insular areas, the new rule will apply to those set to begin their next planning cycle in 2018 or later. Until jurisdictions are required to submit an AFH, they are required to continue submitting analyses of impediments.

Under certain circumstances, the United States Department of Justice (DOJ) will file a fair housing complaint on behalf of residents who are suspected to have suffered a violation of fair housing law. No such complaints have been filed against housing providers, individuals, or officials in the Commonwealth in at least the last ten years.

SECTION IV. REVIEW OF THE EXISTING FAIR HOUSING STRUCTURE

The purpose of this section is to provide a profile of fair housing in the Commonwealth of the Northern Mariana Islands based on a number of factors, including an enumeration of key agencies and organizations that contribute to affirmatively furthering fair housing, evaluation of the presence and scope of services of existing fair housing organizations, and a review of the complaint process.

FAIR HOUSING AGENCIES

FEDERAL AGENCIES

U.S. Department of Housing and Urban Development

The U.S. Department of Housing and Urban Development (HUD) oversees, administers, and enforces the Federal Fair Housing Act. HUD's regional office in San Francisco oversees housing, community development, and fair housing enforcement in the Commonwealth of the Northern Mariana Islands, as well as in American Samoa, Arizona, Guam, Hawaii, California, and Nevada. The contact information for the regional HUD office in San Francisco is as follows:

Address:

San Francisco Regional Office
U.S. Department of Housing and Urban Development
One Sansome Street, Suite 1200
San Francisco, CA 94104

Telephone: (415) 489-6526

FAX: (415) 489-6559

Website: www.HUD.gov

Contact information for HUD's Washington, D.C. office is listed below:

Address:

Office of Fair Housing and Equal Opportunity
Department of Housing and Urban Development
451 Seventh Street SW, Room 5204
Washington, DC 20410-2000

Telephone: (202) 708-1112

Toll Free: (800) 669-9777

Web Site: www.HUD.gov

The Office of Fair Housing and Equal Opportunity (FHEO) within HUD's San Francisco office enforces the Fair Housing Act and other civil rights laws that prohibit discrimination in housing, mortgage lending, and other related transactions in the Northern Mariana Islands. HUD also provides education and outreach, monitors agencies that receive HUD funding for compliance with civil rights laws, and works with state, local, and insular agencies under the

Fair Housing Assistance Program (FHAP) and Fair Housing Initiative Program (FHIP), as described below.

Fair Housing Assistance Program

The Fair Housing Assistance Program (FHAP) was designed to support local, state, and insular agencies that enforce local fair housing laws, provided that these laws are substantially equivalent to the Fair Housing Act. Substantial equivalency certification is a two-phase process: in the first phase, the Assistant Secretary for Fair Housing and Equal Opportunity makes a *prima facie* determination on the substantial equivalency of a state, local, or insular law to the Federal Fair Housing Act. Once this determination has been made, and the law has been judged to be substantially equivalent, the agency enforcing the law is certified on an interim basis for a period of three years. During those three years, the local enforcement organization “builds its capacity to operate as a fully certified substantially equivalent agency.” FHAP grants during this time period are issued to support the process of building capacity. When the interim certification period ends after three years, the Assistant Secretary issues a determination on whether or not the law is substantially equivalent to the Fair Housing Act “in operation”, this is the second phase of the certification process. If the law is judged to be substantially equivalent in operation, the agency enforcing the law is fully certified as a substantially equivalent agency for five years.

HUD will typically refer most complaints of housing discrimination to a substantially equivalent state, local, or insular agency for investigation (such complaints are dual-filed at HUD and the local agency), if such an agency exists and has jurisdiction in the area in which the housing discrimination was alleged to have occurred. When federally subsidized housing is involved, however, HUD will typically investigate the complaint.

The benefits of substantially equivalent certification include the availability of funding for local fair housing activities, shifted enforcement power from Federal to local authorities, and the potential to make the fair housing complaint process more efficient by vesting enforcement authority in those who are more familiar with the local housing market. In addition, additional funding may be available to support partnerships between local FHAP grantees and private fair housing organizations.

The 11th Legislature of the Northern Mariana Islands adopted the “Commonwealth Fair Housing Act” in 1998.⁶⁸ The purpose of the Act was to “ensure that discrimination does not occur in housing transactions” while maintaining “the greatest degree of self-determination and control over the internal operations of the Commonwealth.”⁶⁹ Passage of the law was intended to enable HUD to begin referring fair housing complaints to a local agency for investigation and enforcement.⁷⁰ However, there are currently no Commonwealth agencies participating in the FHAP.

⁶⁸ 2 CMC §40101 et seq

⁶⁹ PL 11-38 §1

⁷⁰ *Ibid.*

Fair Housing Initiative Program

The Fair Housing Initiative Program (FHIP) is designed to support fair housing organizations and other non-profits that provide fair housing services to people who believe they have faced discrimination in the housing market. These organizations provide a range of services including initial intake and complaint processing, referral of complainants to government agencies that enforce fair housing law, preliminary investigations of fair housing complaints, and education and outreach on fair housing law and policy.

FHIP funding is available through three initiatives⁷¹: the Fair Housing Organizations Initiative (FHOI), the Private Enforcement Initiative (PEI), and the Education and Outreach Initiative (EOI). These initiatives are discussed in more detail below:

- **The Fair Housing Organizations Initiative (FHOI):** FHOI funds are designed to help non-profit fair housing organizations build capacity to effectively handle fair housing enforcement and outreach activities. A broader goal of FHOI funding is to strengthen the national fair housing movement by encouraging the creation of fair housing organizations.
- **The Private Enforcement Initiative (PEI):** PEI funds are intended to support the fair housing activities of established non-profit organizations, including testing and enforcement, and more generally to offer a “range of assistance to the nationwide network of fair housing groups”.
- **The Education and Outreach Initiative (EOI):** EOI funding is available to qualified fair housing non-profit organizations as well as state, local, and insular government agencies. The purpose of the EOI is to promote initiatives that explain fair housing to the general public and housing providers, and provide the latter with information on how to comply with the requirements of the FHA.

Non-profit organizations are eligible to apply for funding under each or all of these initiatives. To receive FHOI funding, such organizations must have at least two years’ experience in complaint intake and investigation, fair housing testing, and meritorious claims in the three years prior to applying for funding. Eligibility for PEI funding is subject to “certain requirements related to the length and quality of previous fair housing enforcement experience.” Organizations applying for the EOI must also have two years’ experience in the relevant fair housing activities; EOI funds are also potentially available to state, insular, and local government agencies.

There are currently no organizations serving the Commonwealth of the Northern Mariana Islands as FHIP participants.

COMMONWEALTH AGENCY

The Commonwealth Fair Housing Act vests authority for administration and enforcement of commonwealth fair housing law in the Corporate Director of the Northern Marianas Housing Corporation. Residents who believe that they have experienced discrimination on the basis of

⁷¹ Though there are four initiatives included in the FHIP, no funds are currently available through the Administrative Enforcement Initiative.

race, color, religion, national origin, sex, disability, familial status, or marital status, may contact the Housing Corporation to file a complaint. The Housing Corporation may be contacted through the following information:

Mailing Address:

P.O. Box 500514
Saipan, MP 96950

Central Office (Saipan) Telephone: 1(670)234-6866/9447/7670

Tinian Field Office Telephone: 1(670)433-9213

Rota Field Office Telephone: 1(670)532-9410

Central Office (Saipan) Fax: 1(670)234-9021

Tinian Field Office Fax: 1(670)433-3690

Rota Field Office Fax: 1(670)532-9441

Web Site: <http://www.nmhcgov.net/>

Online Email Contact Form: http://www.nmhcgov.net/contact_slst.asp?ID=1

COMPLAINT PROCESS REVIEW

COMPLAINT PROCESSES FOR FAIR HOUSING AGENCIES

U.S. Department of Housing and Urban Development

The intake stage is the first step in the complaint process. When a complaint is submitted, intake specialists review the information and contact the complainant (the party alleging housing discrimination) in order to gather additional details and determine if the case qualifies as possible housing discrimination. If the discriminatory act alleged in the complaint occurred within the jurisdiction of a substantially equivalent state, insular, or local agency under the FHAP, the complaint is referred to that agency, which then has 30 days to address the complaint. If that agency fails to address the complaint within that time period, HUD can take the complaint back.

If HUD determines that it has jurisdiction and accepts the complaint for investigation, it will draft a formal complaint and send it to the complainant to be signed. Once HUD receives the signed complaint, it will notify the respondent (the party alleged to have discriminated against the complainant) within ten days that a complaint has been filed against him or her. HUD also sends a copy of the formal complaint to the respondent at this stage. Within ten days of receiving the formal complaint, the respondent must respond to the complaint.

Next, the circumstances of the complaint are investigated through interviews and examination of relevant documents. During this time, the investigator attempts to have the parties rectify the complaint through conciliation. The case is closed if conciliation of the two parties is achieved or if the investigator determines that there was no reasonable cause of discrimination. If conciliation fails, and reasonable cause is found, then either a Federal judge or a HUD Administrative Law Judge hears the case and determines damages, if any.⁷² In the event that the

⁷² "HUD's Title VIII Fair Housing Complaint Process." <http://www.hud.gov/offices/fheo/complaint-process.cfm>

Federal court judge finds the discrimination alleged in a complaint to have actually occurred, the respondent may be ordered to:

- Compensate for actual damages, including humiliation, pain, and suffering;
- Provide injunctive or other equitable relief to make the housing available;
- Pay the Federal government a civil penalty to vindicate the public interest, with a maximum penalty of \$10,000 for a first violation and \$50,000 for an additional violation within seven years; and/or
- Pay reasonable attorneys' fees and costs.⁷³

If neither party elects to go to Federal court, a HUD Administrative Law Judge will hear the case. Once the judge has decided the case, he or she issues an initial decision. If the judge finds that housing discrimination has occurred, he or she may award a civil penalty of up to \$11,000 to the complainant, along with actual damages, court costs, and attorney's fees. When the initial decision is rendered, any party that is adversely affected by that decision can petition the Secretary of HUD for review within 15 days. The Secretary has 30 days following the issuance of the initial decision to affirm, modify, or set aside the decision, or call for further review of the case. If the Secretary does not take any further action on the complaint within 30 days of the initial decision, the decision will be considered final. After that, any aggrieved party must appeal to take up their grievance in the appropriate court of appeals.⁷⁴

Northern Marianas Housing Corporation

In addition to the U.S. Department of Housing and Urban Development, Northern Mariana Islanders who believe that they have been subjected to illegal discrimination in the commonwealth housing market may file a complaint with the Corporate Director of the Northern Marianas Housing Corporation. The Corporate Director is responsible for administering the provisions of the Commonwealth Fair Housing Act ("Commonwealth FHA").⁷⁵

Because the Commonwealth FHA was written to be substantially equivalent to the Federal Fair Housing Act, the complaint process that is laid out in the Commonwealth law closely follows the process set forth in the Federal law, as described above, and both laws provide for similar rights, remedies, restrictions, and timelines. The principal difference between the two laws is that the Commonwealth law prohibits discrimination on the basis of marital status, along with all of the bases included in the Federal FHA.

SUMMARY

Northern Mariana Islands residents who believe that they have experienced discrimination on the basis of race, color, religion, national origin, sex, disability, or familial status may file a complaint with the U.S. Department of Housing and Urban Development. Once a complaint has been filed, HUD will notify the party that has been accused of discrimination, and begin investigation of the complaint. At the same time, HUD will encourage the parties to resolve the

⁷³ "Fair Housing—It's Your Right." <http://www.hud.gov/offices/fheo/FHLaws/yourrights.cfm>

⁷⁴ "HUD's Title VIII Fair Housing Complaint Process." <http://www.hud.gov/offices/fheo/complaint-process.cfm>

⁷⁵ 2 CMC §40107

complaint through informal conciliation. If the parties are unable to reach a conciliation agreement, HUD will issue the results of its investigation. If the agency has not found sufficient reason to believe that discrimination has occurred, it will close the investigation⁷⁶. If HUD finds reasonable cause to believe that discrimination has occurred or is about to occur, the parties involved may choose to resolve the complaint through an administrative hearing, or may elect to go before a judge. Those found guilty of housing discrimination may have to pay fines and monetary damages, as well as mandatory fair housing training, adoption of a fair housing policy, and other measures.

In addition to its direct role in fair housing enforcement, HUD also promotes local fair housing outreach, education, investigation, and enforcement through partnerships with local agencies and organizations. Through the Fair Housing Assistance Program (FHAP), HUD offers technical and monetary assistance to government agencies that effectively enforce local fair housing laws, provided that those laws provide at least the same level of protection as the Federal Fair Housing Act ("Federal FHA").

The Commonwealth Fair Housing Act was created in part to allow the Northern Marianas Housing Corporation to assume responsibility for fair housing enforcement; however, at present the Housing Corporation is not a participant in the FHAP. However, the Housing Corporation will accept complaints from Commonwealth residents who believe that they have experienced discrimination on any of the bases included in the Federal FHA, as well as those who may have experienced discrimination based on their marital status.

HUD also provides funding to local nonprofit organizations that conduct fair housing outreach, education, or investigation through the Fair Housing Initiatives Program (FHIP). There are currently no FHIP participants operating in the Northern Mariana Islands.

⁷⁶ HUD also closes the investigation if the parties reach a successful conciliation agreement.

SECTION V. FAIR HOUSING IN THE PRIVATE SECTOR

As part of the AI process, the U.S. Department of Housing and Urban Development (HUD) suggests that the analysis focus on possible housing discrimination issues in both the private and public sectors. Examination of housing factors in the Commonwealth of the Northern Mariana Islands' public sector is presented in **Section VI**, while this section focuses on research regarding the Commonwealth's private sector, including the mortgage lending market, the real estate market, the rental market, and other private sector housing industries.

SMALL BUSINESS LENDING ANALYSIS

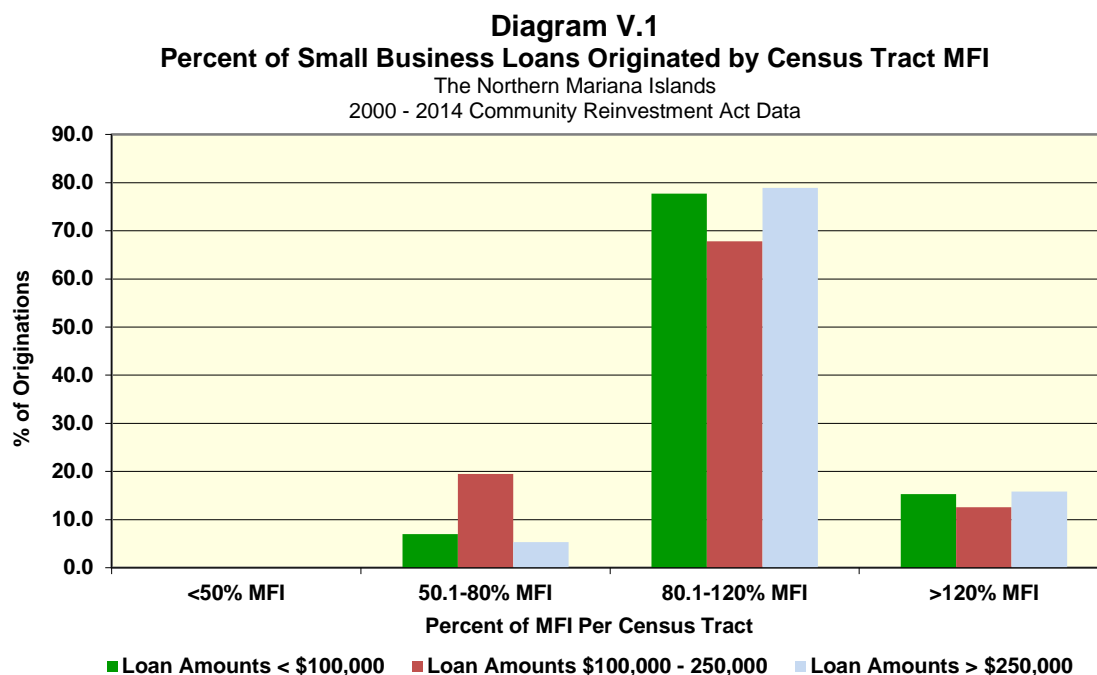
COMMUNITY REINVESTMENT ACT DATA

The economic vitality of neighborhoods can partly be measured through Community Reinvestment Act (CRA) data, which detail small business lending activity. According to those data, lenders issued 1,940 small business loans, totaling around \$105 million, from 2000 through 2014. Over 98 percent of these loans were issued on Saipan, along with 96.9 percent of the total value of loans issued in the CNMI. Rota received around 1.7 percent of loans and 3 percent of loan dollars. There were no loans issued on Tinian during that time period, according to CRA data.

Tables with complete CRA data are presented in Appendix A.

Small business loans were also analyzed to determine how the level of small business activity varied according to the income level of the Census tracts in which those loans were issued. Census tracts in which the median family income ("MFI") was less than 50 percent of the area MFI were considered "low-income" Census tracts. In "moderate-income" Census tracts the MFI ranged from 50.1 to 80 percent of the area MFI. Census tract MFIs ranged from 80.1 to 120 percent of the area MFI in "middle-income" Census tracts, and those with MFIs above 120 percent of the area MFI were considered "high-income."

Diagram V.1 on the following page presents the distribution of small business loans by value and the income level of the Census tract in which the loans were issued. As the diagram shows, the bulk of small business loans issued between 2000 and 2014 went to middle-income Census tracts. More than ten percent of those loans went to high-income Census tracts, and though some loans were issued in moderate-income Census tracts, no loans were issued in low-income Census tracts.



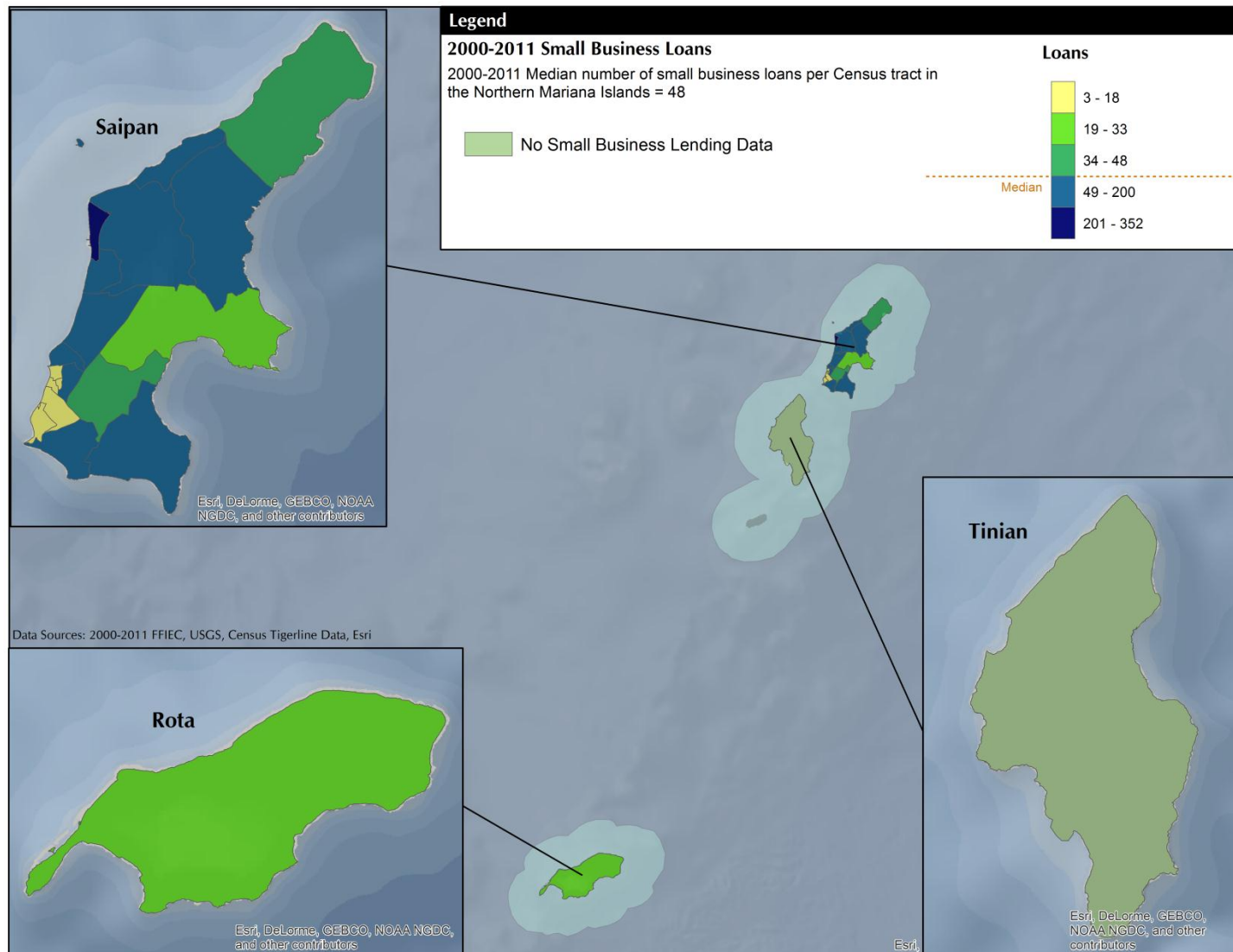
Small business lending on Saipan tended to focus on areas along the western coast, as shown in Map V.1 on the following page. The greatest number of small business loans issued in any CNMI Census tract was issued in and around American Memorial Park, which received 352 small business loans from 2000 through 2014, or around 18 percent of loans issued in the CNMI throughout that period. Census tracts throughout the northern-central and southern parts of Saipan also saw considerable lending activity. By contrast, the number of small business loans was well below median in Census tracts on the southwestern shore of Saipan, around Chalan Kanoa and San Antonio, and throughout the island of Rota.

Small business lending in 2012 through 2014 largely followed a similar pattern, as shown in Map V.2 on page 84. The number of small business loans issued along the western coast of Saipan tended to be at or above the overall median, except in Census tracts at the southern end of the coast. Loans were also well below median in and around Kagman, the northern tip of Saipan, and on Rota.

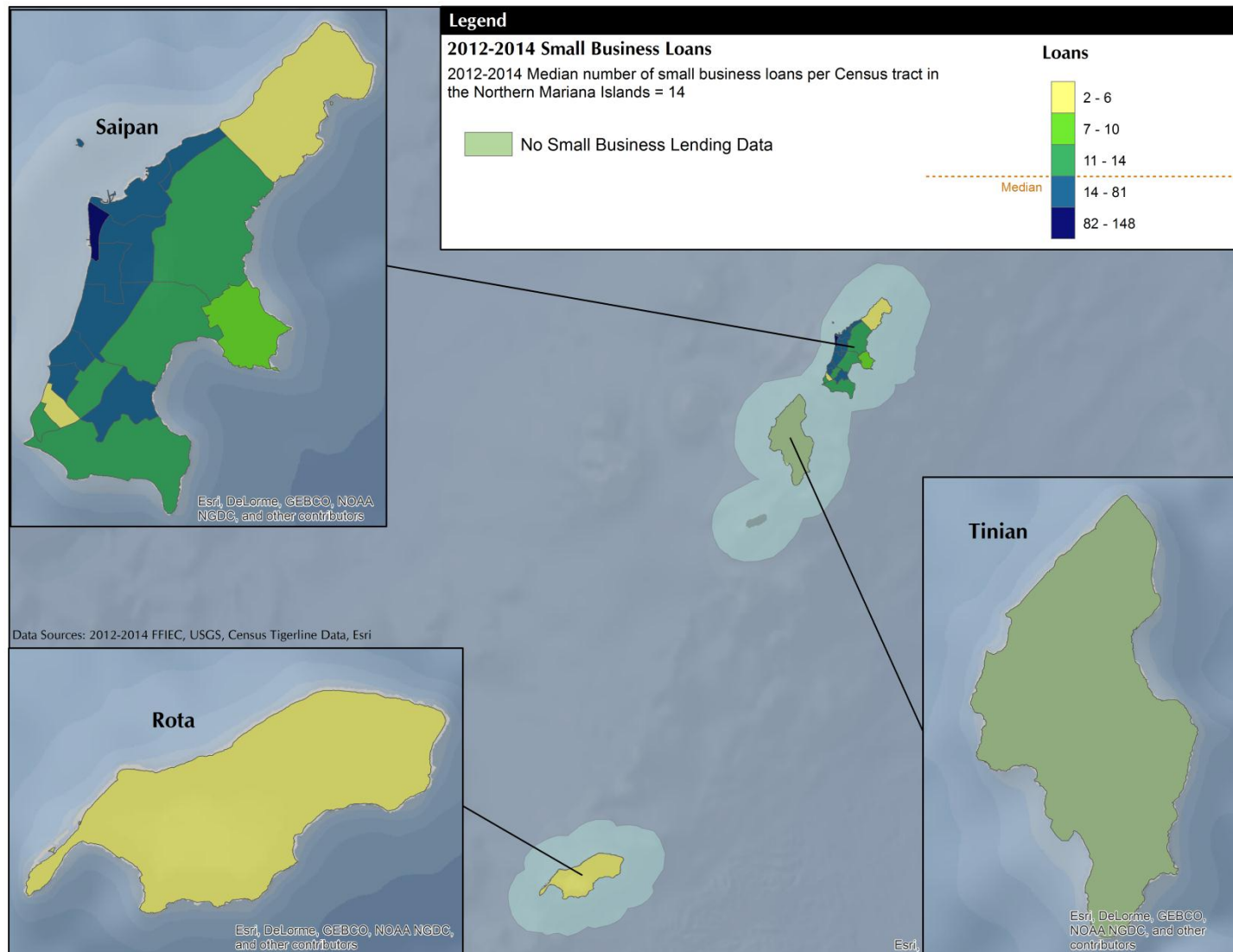
As one might expect, the total value of loans issued in Census tracts throughout the Commonwealth tended to be higher in areas that received more loans. However, as shown in Map V.3 on page 85, the value of loans issued on Rota was above the per-tract median for the Commonwealth as a whole from 2000 through 2011, in spite of the fact that Rota received well-below the median number of small business loans. The value of loans was also well above median in Census tracts along with central-west coast of Saipan, as well as the Census tract containing the Saipan International Airport.

Census tracts along Saipan's western coast continued to receive a relatively large amount of small business loan dollars after 2011, as shown in Map V.4 on page 86. Rota, by contrast, received relatively few loan dollars after 2011.

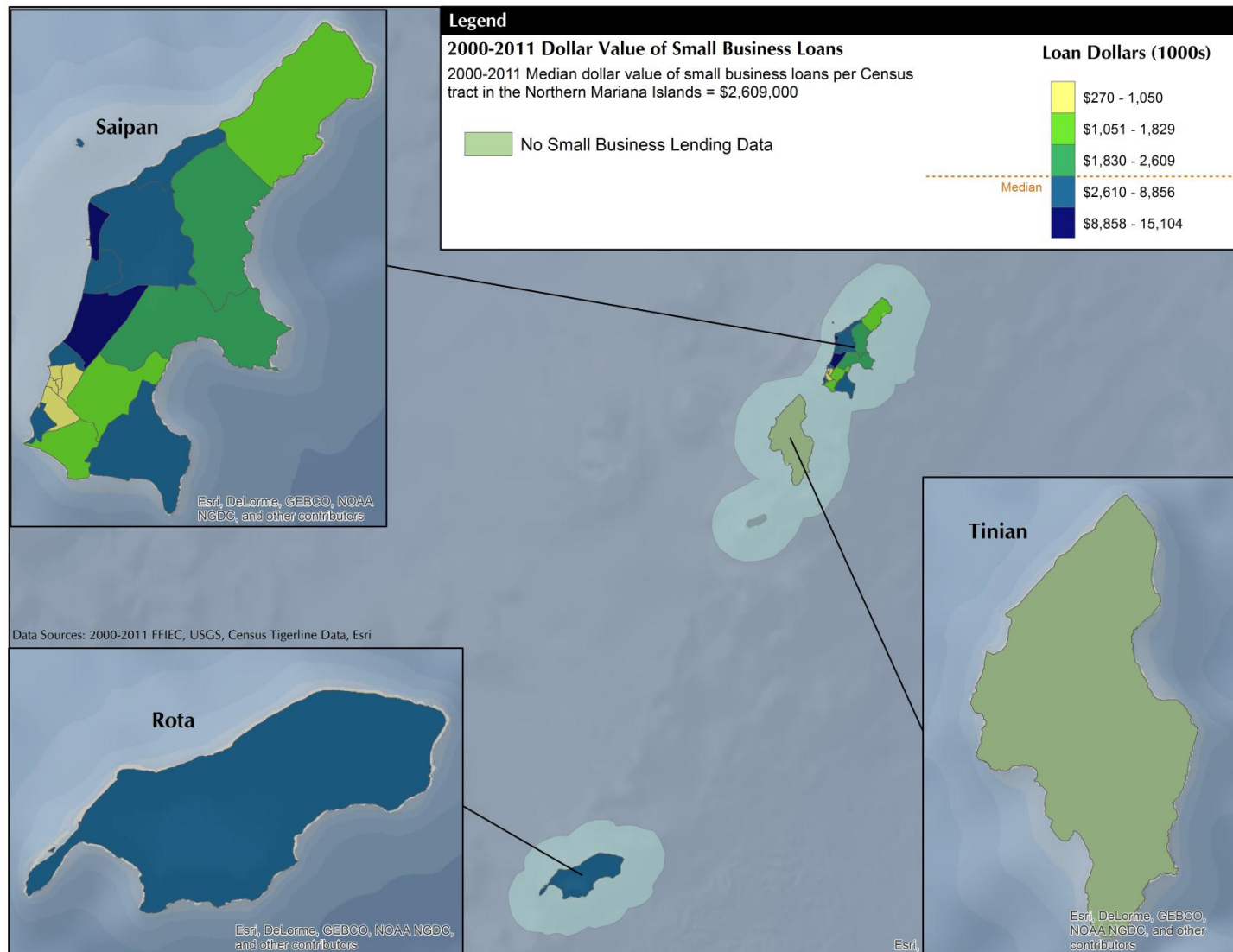
Map V.1
Number of Small Business Loans, 2000-2011
 The Northern Mariana Islands
 2000–2011 CRA Data



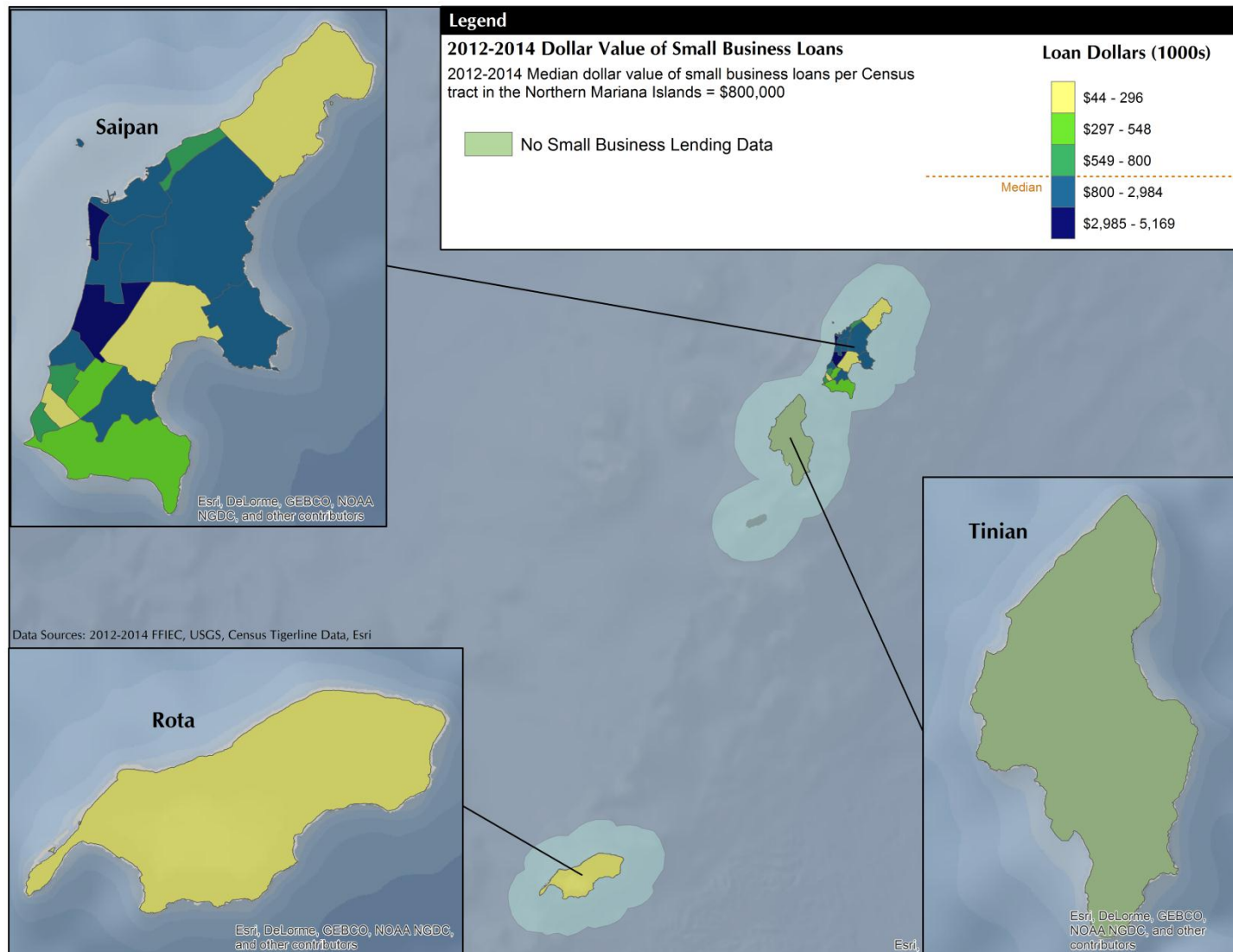
Map V.2
Number of Small Business Loans, 2012-2014
 The Northern Mariana Islands
 2012–2014 CRA Data



Map V.3
Amount of Small Business Loan Dollars, 2000-2011
 The Northern Mariana Islands
 2000–2011 CRA Data



Map V.4
Amount of Small Business Loan Dollars, 2012-2014
 The Northern Mariana Islands
 2012–2014 CRA Data



FAIR HOUSING COMPLAINTS

As noted previously, the Department of Housing and Urban Development accepts complaints from Commonwealth residents who believe that they have been subjected to illegal discrimination in the housing market. However, HUD has not received any such complaints since 2004, as noted in Figure D.1 in Appendix D, a response by a HUD representative to a recent request for fair housing complaint data.

FAIR HOUSING SURVEY – PRIVATE SECTOR RESULTS

Additional evaluation of fair housing within the Commonwealth of the Northern Mariana Islands was conducted through a survey of stakeholders that began in July of 2015. The purpose of the survey was to gather insight into the knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing. Results and comments related to the questions in the private sector are presented below, and additional survey results are discussed in **Sections VI and VII**.

The 2015 Commonwealth of the Northern Mariana Islands Fair Housing Survey was completed by 209 persons in the Commonwealth. Survey responses were collected through internet-based and paper versions of the survey. Most questions in the survey required simple “yes,” “no,” or “don’t know” responses, although many questions allowed the respondent to offer written comments. When many respondents reported that they were aware of questionable practices or barriers, or when multiple narrative responses indicated similar issues, findings suggested likely impediments to fair housing choice.

Numerical tallies of results and summaries of some comment-driven questions are presented in this section. A complete list of written responses is available in Appendix B.

FAIR HOUSING IN THE PRIVATE SECTOR

In order to gauge perceptions of fair housing in the Commonwealth of the Northern Mariana Islands’ private housing sector, survey respondents were asked to identify their awareness of possible housing discrimination issues in a number of areas within the private housing sector, including the:

- Rental housing market,
- Real estate industry,
- Mortgage and home lending industry,
- Housing construction or accessible housing design fields,
- Home insurance industry,
- Home appraisal industry, and
- Any other housing services.

If respondents indicated that they were aware of possible discriminatory issues in any of these areas, they were asked to further describe issues in a narrative fashion. Note that when percentage figures are cited in the following narrative, those figures are based only on respondents who answered each question, with missing responses omitted.

Respondents to the survey were generally unaware of any potential barriers to fair housing choice in any of the specific areas or industries mentioned. As shown in Table V.1 below, eleven respondents were aware of questionable practices or barriers to fair housing choice in the rental housing market, or around 5.9 percent. Ten respondents were aware of potential barriers in the housing construction or the accessible housing design fields, or around 5.7 percent, and seven reported being aware of questionable practices in the home insurance industry. Thirteen respondents maintained that they were aware of questionable practices in “other” housing services, or around 7.6 percent. These respondents cited a range of issues, from delays in housing applications to inconsistent maintenance to unresponsiveness on the part of Section 8 program administrators. A majority of respondents selected “don’t know” in responses to each question in this section.

Table V.1
Barriers to Fair Housing in the Private Sector
 The Commonwealth of Northern Marianas Islands
 2015 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	11	70	105	23	209
The real estate industry?	8	46	134	21	209
The mortgage and home lending industry?	4	46	124	35	209
The housing construction or accessible housing design fields?	10	43	121	35	209
The home insurance industry?	7	43	122	37	209
The home appraisal industry?	2	44	128	35	209
Any other housing services?	13	37	122	37	209

SUMMARY

Housing choice is affected by a number of private-sector factors, including small business investment, attitudes and practices among housing providers, and trends in the rental housing market, home lending, and housing construction, among others.

The 2015 AI included a review of data gathered under the Community Reinvestment Act (CRA). According to those data, some 1,940 small business loans were issued in the CNMI from 2000 through 2014. Over 98 percent of these loans were issued on Saipan, totaling more than \$102 million. Census tracts along the western coast of Saipan tended to receive the most loans and loan dollars, though relatively few small business loans went to Census tracts in and around Chalan Kanoa, Chalan Piao, and San Antonio.

As noted previously, the U.S. Department of Housing and Urban Development accepts fair housing complaints from residents who believe that they have been subjected to unlawful discrimination in the housing market, as does the Corporate Director of the Northern Marianas Housing Corporation. However, neither agency has received any fair housing complaints since at least 2008.

Respondents to the 2015 Fair Housing Survey were generally unaware of any questionable practices or barrier to fair housing choice: fewer than ten percent of respondents noted that they were aware of questionable practices or barriers to fair housing choice in any of the private sector industries or areas mentioned. A majority of respondents answered “don’t know” in response to each question.

SECTION VI. FAIR HOUSING IN THE PUBLIC SECTOR

While the previous section presented a review of the status of fair housing in the private sector, this section will focus specifically on fair housing in the public sector. The U.S. Department of Housing and Urban Development (HUD) recommends that the AI investigate a number of housing factors within the public sector, including health and safety codes, construction standards, zoning and land use policies, tax policies, and development standards. The AI should also examine the placement of public and publicly assisted housing as well as access to government services.

PUBLIC SERVICES

Community features, including public services and facilities, and the location of public and assisted housing are essential parts of good neighborhoods, leading to a more desirable community.

VOUCHER-ASSISTED HOUSING UNITS

Housing Choice Vouchers are portable housing subsidies: recipients can choose where to live as long as the landlord accepts the vouchers and the unit meets a certain set of HUD-defined criteria. The program covers monthly rental costs minus the tenant's contribution, which is at most thirty percent of his or her monthly adjusted income or ten percent of monthly unadjusted gross income. The Northern Marianas Housing Corporation administers the Housing Choice Voucher Program on behalf of Commonwealth residents.

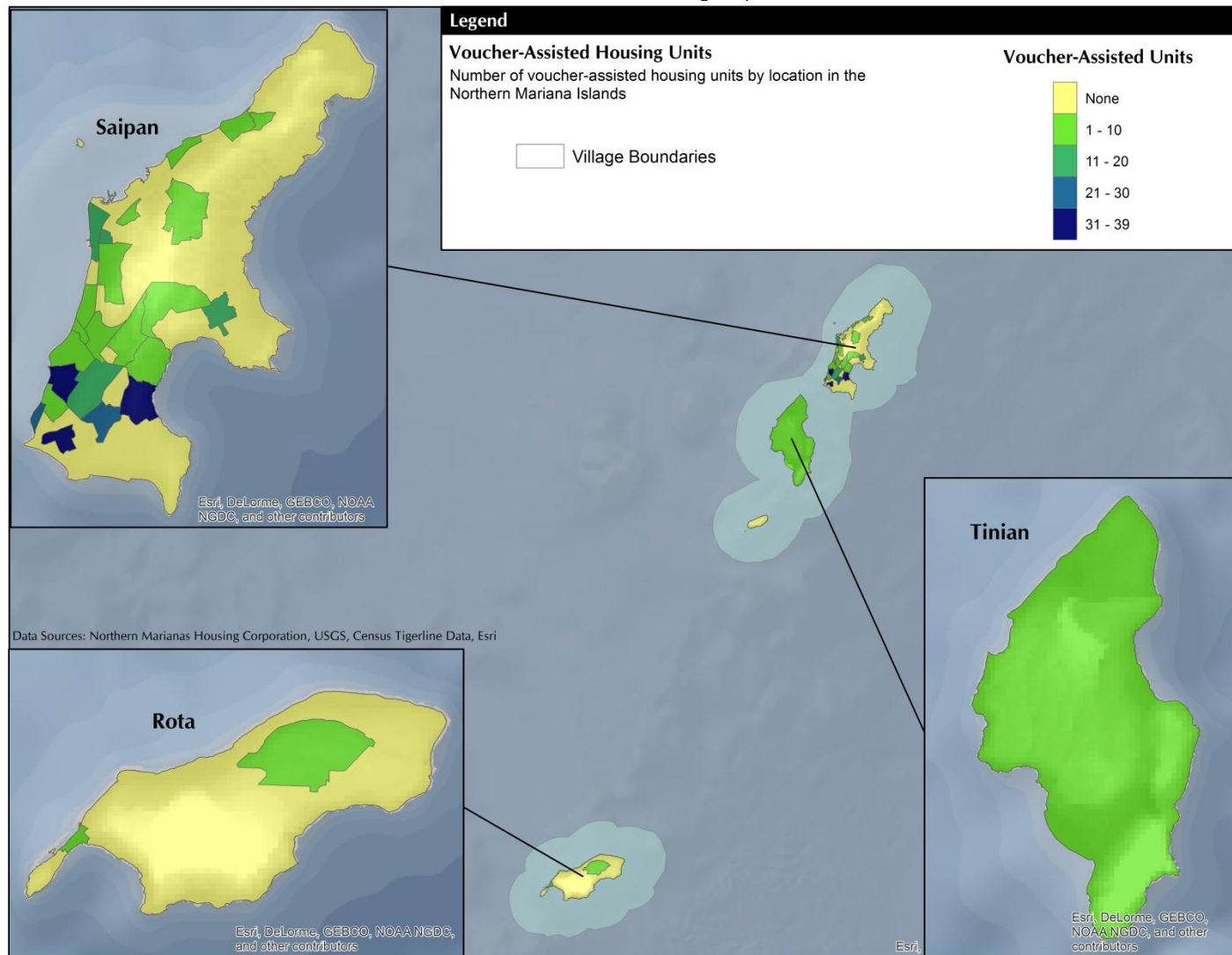
The numbers of Housing Choice Vouchers in use in villages throughout the Commonwealth is presented in Map VI.1 on the following page. Although there were voucher-assisted housing units located throughout Saipan, they were more common in villages near the southern end of the island, which also tended to have larger populations. The greatest number of housing choice vouchers appeared in Chalan Konoa, Koblerville, and Dandan, where between 31 and 39 households were assisted through the voucher program. There were a handful of vouchers issued on Tinian, as well as in Songsong and Sinapalo on the island of Rota.

ZONING AND LAND-USE PLANNING

In order to assess potential barriers to fair housing choice in local zoning or land-use laws, the AI effort included a review of the Saipan Zoning Law of 2013.

Fair housing laws seek to protect classes of persons with certain attributes from discrimination, including individuals with disabilities, seniors, and families with children. In order to support these protected classes, it is helpful to have accurate definitions of these classes and to consider the potential effects of zoning and land use policies. Some definitions of "dwelling" or "residential unit" can hinder the provision of housing for disabled or other special needs persons, and can inadvertently discriminate against boarding or care facilities.

Map VI.1
Voucher-Assisted Housing Units
 The Northern Mariana Islands
 2015 Northern Marianas Housing Corporations



Saipan's zoning law does include a definition of "dwelling unit", defining such a unit as a "room or group of rooms" that is designed to provide "living quarters for not more than one family." A "family", in turn, is defined as "one or more persons related by blood, marriage, or law occupying a dwelling unit and living as a single housekeeping unit." Given that dwelling units are nominally limited to a single family, there is the potential that these provisions may serve as a limitation on persons with non-traditional living arrangements; however, there is no provision explicitly limiting the number of people that may live in a dwelling unit.

The Saipan Zoning Code was also assessed for the presence or absence of provisions that may serve to promote or limit certain uses or types of housing. Mixed-use developments, or those which include residential and non-residential uses, are permitted in commercial and tourist-oriented areas, and are allowed under conditional-use permits in the Village Residential zoning district. "Institutional residential" uses, which include group homes and other types of supportive housing, are allowed only by conditional-use permit. Multifamily housing projects that are less than 48 feet in height are permitted in most zoning districts that allow residential development more generally. Multifamily projects that exceed that height generally require conditional use permits.

There is no definition in the zoning code for "disability", and there are few provisions in the Saipan Zoning Law that relate specifically to disability. The few provisions relating to disability include requirements that off-street parking include parking for vehicles that transport persons with physical disabilities, in accordance with the Federal ADA. In addition, pedestrian pathways are also required to conform to the ADA, along with Federal and CNMI codes for mobility-impaired persons.⁷⁷

FAIR HOUSING SURVEY – PUBLIC SECTOR RESULTS

As mentioned previously, further evaluation of the status of fair housing within Commonwealth of the Northern Mariana Islands was conducted through the 2015 Fair Housing Survey, which was completed by 209 stakeholders and citizens. Those solicited for participation included a wide variety of individuals in the fair housing arena. Most questions in the survey required "yes," "no," or "don't know" responses, and many allowed the respondent to offer written comments. While the numerical tallies of results are presented in this section, along with summaries of some comment-heavy questions, a complete list of written responses is available in Appendix B. Other survey results are also discussed in **Sections V** and **VII**.

FAIR HOUSING IN THE PUBLIC SECTOR

Public sector effects on housing can be complex and varied. The questions in this section of the survey asked respondents to think about possible barriers to fair housing choice within very specific areas of the public sector, as follows:

- Land use policies,
- Zoning laws,
- Occupancy standards or health and safety codes,

⁷⁷ Saipan Zoning Law of 2013

- Property tax policies,
- Permitting processes,
- Housing construction standards,
- Neighborhood or community development policies,
- Access to government services, and
- Any other public administrative actions or regulations.

As before, if respondents indicated that they were aware of possible discriminatory issues in any of these areas they were asked to further describe issues in a narrative fashion. Once again, any percentage figures presented in the following narrative were calculated by excluding missing responses, and represent percentages of respondents who actually answered a given question.

As was the case in the private sector portion of the survey, relatively few respondents were aware of questionable practices or fair housing issues in any of the specific public sector areas mentioned. As shown in Table VI.1 below, twelve respondents were aware of limitations in access to government services that amounted, in their estimation, to barriers to fair housing choice, or around 6.9 percent of respondents. Four out of the eight respondents who provided examples of specific limitations in government services cited a lack of public transportation. Ten respondents were aware of questionable practices or barriers to fair housing choice in zoning laws, nine in property tax policies and housing, ten in construction standards, and seven each in land use policies, occupancy standards and health and safety codes. No more than four percent of respondent were aware of questionable practices of barriers to fair housing choice in any of the other public sector areas mentioned. More than seventy percent of respondents selected “don’t know” in response to each question.

Table VI.1
Barriers to Fair Housing in the Public Sector
The Commonwealth of Northern Marianas Islands
2015 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?	7	46	129	27	209
Zoning laws?	10	39	133	27	209
Occupancy standards or health and safety codes?	7	40	118	44	209
Property tax policies?	9	30	128	42	209
Permitting process?	3	40	123	43	209
Housing construction standards?	10	35	119	45	209
Neighborhood or community development policies?	5	35	126	43	209
Limited access to government services, such as transportation or employment services?	12	38	125	34	209
Public administrative actions or regulations?	7	36	134	32	209

SUMMARY

The ability of CNMI residents to choose where they live and obtain housing is affected by policies and practices in the public sector. The 2015 AI effort included a review several factors, including the location of assisted housing units, the 2013 Saipan Zoning Law, and public awareness of fair housing issues in land use and zoning policy, accessible design standards, the provision of public services, and other areas.

The U.S. Department of Housing and Urban Development provides rental assistance low-income residents of the CNMI through the Housing Choice Voucher program. This program, which is administered locally by the Northern Marianas Housing Corporation, makes portable housing subsidies available to qualified residents, allowing them to choose housing in any location where the landlord accepts the subsidy. There are currently around three-hundred housing choice vouchers in use throughout the commonwealth. Most of these are on Saipan, the most populous island, and they are generally more highly concentrated in the more populous areas of the island.

Analysis of the public sector in the context of fair housing also included a review of the Saipan Zoning Law of 2013. This analysis did not reveal notable, overt barriers to fair housing choice; however, some elements were missing that might serve to promote broader access to housing. For example, conditional-use permits are required for institutional use permits, a classification which includes group homes and other types of supportive housing.

As was the case with the private sector portion of the 2015 Fair Housing Survey, those who responded to questions concerning the public sector were generally unaware of any questionable practices or barriers to fair housing choice in any public sector policies or practices. Limitations in access to government services was the most salient challenge from a fair housing perspective, but even those who were aware of fair housing issues in this area accounted for a small minority of survey respondents at 6.9 percent. Four of the eight who went on to identify specific issues relating to limitations in government services cited a lack of public transportation. More than seventy percent of respondents answered each question in this section with “don’t know.”

SECTION VII. PUBLIC INVOLVEMENT

This section discusses analysis of fair housing in the Commonwealth of the Northern Mariana Islands as gathered from various public involvement efforts conducted as part of the AI process. Public involvement feedback is a valuable source of qualitative data about impediments, but, as with any data source, citizen comments alone do not necessarily demonstrate the existence of impediments to fair housing choice. However, survey responses that support findings from other parts of the analysis reinforce findings from other data sources concerning impediments to fair housing choice.

FAIR HOUSING SURVEY

As discussed in previous sections, a 2015 Fair Housing Survey comprised a large portion of the public involvement efforts associated with the development of the 2015 AI. While data from the survey regarding policies and practices within the private and public sectors have already been discussed, questions included to gauge and characterize public participation in the survey are discussed below.

The purpose of the 2015 Fair Housing Survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing.

A total of 209 persons in the Commonwealth completed the survey, which was conducted through online and paper survey forms. A complete list of responses is included in Appendix B. Other survey results are also discussed in **Sections V and VI**.

Respondents to the 2015 Northern Mariana Islands Fair Housing Survey play a variety of roles in the Commonwealth's housing market. As shown in Table VII.1 at right, twenty-one respondents identified themselves as service providers, seventeen as advocates/service providers, thirteen as construction/development professionals, ten as local government officials, and seven as real estate professionals.

Table VII.2
What is Your Housing Situation?

The Commonwealth of Northern
Marianas Islands
2015 Fair Housing Survey Data

Tenure	Total
Homeowner	35
Renter	109
Other	32
Missing	33
Total	209

A majority of survey respondents, or around 62 percent, were renters, as shown in Table VII.2 at left. Thirty-five respondents were homeowners, and 32 identified their housing situation as "other".

A total of 114 respondents considered themselves to be unfamiliar with fair housing laws, as shown in Table VII.3 on the following page, a majority of those who gave a response to this question. Of those who reported having some level of familiarity with fair housing laws, a majority considered themselves to be "somewhat"

Table VII.1
Role of Respondent
The Commonwealth of Northern
Marianas Islands
2015 Fair Housing Survey Data

Primary Role	Total
Service Provider	21
Advocate/Service Provider	17
Construction/Development	13
Local Government	10
Real Estate	7
Banking/Finance	6
Appraisal	3
Property Management	3
Insurance	2
Law/Legal Services	1
Other Role	59
Missing	67
Total	209

familiar with them, while 26 respondents felt that they were very familiar with fair housing laws.

Ninety-four respondents, or around 49 percent, felt that fair housing laws were useful, as shown in Table VII.4 below. Only 12 respondents maintained that fair housing laws do not serve a useful purpose, though 86 selected “don’t know” in response to this question, or just under 45 percent of respondents. Relatively few respondents, around 18 percent, affirmed that fair housing laws are difficult to understand or follow, though a majority of respondents to that question selected “don’t know”. A majority also selected “don’t know” when asked if they thought that fair housing protections should be extended to other groups. When asked to identify any groups needing additional protections, several respondents identified non-native residents or workers, while others identified indigenous or local residents. Around 41 percent of respondents did not feel that fair housing laws were adequately enforced, while nearly half did not know enough about current enforcement levels to weigh in on this question.

Table VII.3
How Familiar are you with Fair Housing Laws?

The Commonwealth of Northern
Marianas Islands
2015 Fair Housing Survey Data

Familiarity	Total
Not Familiar	114
Somewhat Familiar	43
Very Familiar	26
Missing	26
Total	209

Table VII.4
Federal and Local Fair Housing Laws

The Commonwealth of Northern Marianas Islands
2015 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws are useful?	94	12	86	17	209
Are fair housing laws difficult to understand or follow?	34	58	99	18	209
Do you think additional groups should be protected under commonwealth fair housing law?	49	17	106	37	209
Do you thing fair housing laws are adequately enforced?	21	77	91	20	209

Twenty-one respondents were aware of an available training process by which they might learn more about fair housing laws, and thirteen respondents had participated in such training, as shown in Table VII.5 below. Over a quarter of respondents felt that current levels of outreach and education were insufficient, and a majority did not know enough about current outreach and education efforts to respond. Only sixteen respondents felt that current levels of outreach and education were sufficient, and four felt that those levels were excessive. Similarly, less than eight percent of respondents were aware of any fair housing testing in the islands; few considered current levels of testing to be adequate, and fewer still considered them to be excessive.

Table VII.5
Fair Housing Activities

The Commonwealth of Northern Marianas Islands
2015 Fair Housing Survey Data

2018 Fair Housing Survey Data						
Question		Yes	No	Don't Know	Missing	Total
Is there a training process available to learn about fair housing laws?		21	77	91	20	209
Have you participated in fair housing training?		13	65	59	72	209
Are you aware of any fair housing testing?		14	67	105	23	209
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	56	16	4	112	21	209
Is there sufficient testing?	37	12	5	132	23	209

Respondents were also asked to identify as many groups as they could that were protected under commonwealth or Federal laws, with race and disability given as examples of protected classes. Sixty-eight respondents answered this question, and as shown in Table VII.6 at right, no more than twelve respondents were able to correctly identify any protected group in addition to race and disability, or around 17.6 percent. Sixteen respondents incorrectly identified age as a protected class, and eleven mistakenly included income.⁷⁸ Ten respondents correctly identified national origin as a protected class, eight respondents correctly identified gender, and five correctly identified color.

Table VII.6
Protected Classes
The Commonwealth of Northern Marianas
Islands
2015 Fair Housing Survey Data

Protected Class	Total
Age	16
Religion	12
Income	11
National Origin	10
Gender	8
Family Status	6
Color	5
Disability	5
Race	5
Sexual Orientation	5
Ethnicity	3
Marital Status	3
Military	2
Ancestry	1
Victims of Domestic Violence	1
Other	41
Total	164

Respondents were asked a couple of questions relating to fair housing laws, policies, and issues at the local level. As shown in Table VII.7 below, there were only seven respondents who were aware of any city or county fair housing ordinance, regulation, or plan. Only ten respondents were aware of any specific geographic areas with fair housing problems: One of these respondents cited a practice whereby a single owner will purchase housing units in “prime areas” and evict current residents to make way for new tenants. Other respondents cited Saipan as an area with fair housing challenges, along with the “[the CNMI] in general.”

Table VII.7
Local Fair Housing
The Commonwealth of Northern Marianas Islands
2015 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any city or county fair housing ordinance, regulation, or plan?	7	76	81	45	209
Are there any specific geographic areas that have fair housing problems?	10	28	125	46	209

Finally, respondents were asked if they had any additional comments to share, and the comments received in response to this question were predictably wide-ranging: Some respondents felt that fair housing was not as much of an issue as the quality and safety of housing units in general. Other respondents highlighted a need for additional education on the subject of fair housing. One respondent underscored an issue identified in response to the previous question, describing a practice of “monopoly owners” buying properties and evicting current residents in favor of new residents. Finally, several respondents cited issues relating to housing cost, with one noting that housing costs were out of step with the minimum wage in the Commonwealth.

⁷⁸ Though there are age-related provisions in certain Federal housing programs, there are no general provisions that prohibit age-based housing discrimination in Federal or commonwealth law.

FAIR HOUSING FORMAL MEETING

FAIR HOUSING FORMAL PRESENTATION

A formal presentation of the findings from the 2015 Analysis of Impediments to Fair Housing Choice in the Northern Mariana Islands is scheduled to take place on Saipan in November of 2015. The content of the meeting and any subsequent discussions or additional information will be included in the final report.

SUMMARY

During the 2015 AI process, the Commonwealth encouraged participation in fair housing planning through the 2015 Fair Housing Survey and a public meeting, held in November of 2015, in which findings from the AI were presented to stakeholders and citizens.

The 2015 Fair Housing Survey, along with efforts to disseminate and promote participation in the survey, constituted a large part of the public involvement efforts during the AI process. Respondents to the survey included service providers, advocates/service providers, construction and development professionals, local government officials, real estate professionals, and others. Nearly two-thirds of survey respondents were renters, and a clear majority considered themselves to be unfamiliar with fair housing laws.

However, nearly half of survey respondents considered fair housing laws to be useful, though around 18 percent felt that those laws are difficult to understand or follow. There was limited support for extending additional fair housing protections, with some respondents citing a need for protections for non-native residents or workers, and others identifying a need to protect local residents in fair housing laws. Around 41 percent felt that fair housing laws are not adequately enforced, and only 11 percent of respondents felt that they were adequately enforced.

Few respondents, or around eleven percent, were aware of any existing fair housing training process, and fewer still had participated in such training. There was broad agreement that current fair housing outreach and education activity was insufficient, and few respondents were aware of any fair housing testing in the Commonwealth.

No more than 17.6 percent of respondents were able to correctly identify groups protected under the Federal or Commonwealth Fair Housing Act: this percentage of respondents correctly identified “religion” as a protected class, and a similar share identified “national origin.” However, a similar share also identified “income” as a protected class, which is not protected under Federal or commonwealth fair housing laws. In addition, more than a fifth of respondents cited “age” as a protected class, which is not protected under general fair housing provisions at the Federal or local level. Fewer than five percent of respondents were aware of any local fair housing ordinance, regulation, or plan.

A formal presentation of findings from the 2015 AI process is scheduled for November of 2015. The content of the meeting and any subsequent discussions or additional information will be included in the final report.

SECTION VIII. SUMMARY OF FINDINGS

This AI reviews both the public and private sector contexts for housing markets in the Northern Mariana Islands to determine the effects these forces have on housing choice. As part of that review, analysis of demographic, economic, and housing data provide background context for the environments in which housing choices are made. Demographic data indicate the sizes of racial and ethnic populations and other protected classes; economic and employment data show additional factors in influencing housing choice; and counts of housing by type, tenure, quality, and cost indicate the ability of the housing stock to meet the needs of commonwealth residents.

Once this contextual background analysis has been performed, the analysis turns to a detailed review of fair housing laws, cases, studies, complaints, and public involvement. The structure provided by local and Federal fair housing laws shapes the complaint and advocacy processes available in the CNMI, as do the services provided by local and Federal agencies. Private sector factors in the homeownership and rental markets have a considerable influence on fair housing choice. In the public sector, policies and codes of local governments and the location of affordable rental units can significantly affect the housing available in each area, as can neighborhood and community development trends. Public involvement feedback further helps to define problems and possible impediments to housing choice for persons of protected classes.

Socio-Economic Context

Demographic

The total population of the Northern Mariana Islands fell considerably between 2000 and 2010, owing in large part to a decline in the number of residents aged 20 to 34. This decline marked a shift in the composition of the Northern Marianas population: In 2000, more than forty percent of residents were aged 20 to 34. By 2010, residents in that age range accounted for less than 18 percent of the Commonwealth population. By contrast, the islands saw marked growth in the number of residents aged 55 and older.

Over one quarter of the Commonwealth population resided in “group quarters” in 2000, or 17,791 residents. Most of these residents lived in “other institutional” settings, a category which includes worker dormitories. By 2010, the number of residents living in group quarters had fallen to 1,571 throughout the Commonwealth. It is probable that the group quarters population was composed primarily of workers in the textile industry, largely migrant laborers from China and other Asian countries. Excluding these residents from population figures suggest that the population living in households actually increased, from 51,430 in 2000 to 52,312 in 2010.

The racial and ethnic composition of the population changed between 2000 and 2010: this was most pronounced in the marked increase in the number of residents who identified themselves as belonging to two or more racial/ethnic groups. From 4.8 percent of the population in 2000, the multi-racial/ethnic population grew to 12.7 percent by 2010, more than doubling in number in the process. Asian residents constituted a majority of the single-

race/single-ethnicity (SRSE) population in both years; however, the number of Asian residents fell by 30.9 percent over the decade. The decline in population was slower among Native Hawaiian/Pacific Islander residents, who represented a larger share of the SRSE population in 2010 than they had in 2000. Among Native Hawaiian/Pacific Islander residents, 68.6 percent were Chamorro, and 13.1 percent were Carolinian. Among Asian residents, 70.7 percent were Filipino, and 13.6 percent were Chinese.

Geographically, Asian residents tended to make up larger shares of the population in Census block groups on the west coast of Saipan and around central San Jose on Tinian. The Native Hawaiian/Pacific Islander population, on the other hand, represented larger shares of the population in eastern block groups on Saipan, rural areas of Tinian, and throughout the island of Rota. The highest concentrations of residents who identified themselves as multi-racial/ethnic appeared in northern and eastern block groups on Saipan.

Around 14 percent of the Commonwealth population was counted as living with some form of disability in 2000. The highest concentrations of residents with disabilities were observed in block groups along the western coast of Saipan, where as much as 57.7 percent of the population was living with a disability. Similar concentrations of residents with disabilities were not observed in 2010, when residents with disabilities accounted for 5.5 percent of the population overall. It should be noted that the Census questionnaire from 2010 differed considerably from that of the 2000 Census where disability is concerned. For that reason, the Census Bureau discourages direct comparisons between the two: it would not be correct to conclude, for example, that the share of residents with disabilities actually declined from 14 to 5.5 percent, since those two figures are based on substantively different criteria for who is to count as living with a disability.

Economics

Even as the overall population declined, and with it the size of the Commonwealth labor force, the number and share of workers who were unemployed rose considerably. Around 4 percent of people in the labor force were unable to find work in 2000, or 1,712 workers. By 2010, the number of workers who were unable to find employment had risen to 3,123, representing 11.2 percent of the labor force. This overall trend was not reflected on Tinian, where the unemployment rate fell slightly over the decade. Though female workers were less likely than their male counterparts to be unemployed in 2000, growth in the unemployment rate was considerably more rapid among female workers. By 2010, some 13 percent of the female labor force in the Commonwealth was unemployed.

The decade between 2000 and 2010 saw the collapse of the Commonwealth's manufacturing sector. In 2000, more than 17,000 Northern Mariana residents worked in manufacturing, or 40.7 percent of the working population. By 2010, fewer than 700 workers had manufacturing jobs, or 2.8 percent of the working population. The largest industry in the Commonwealth in 2010, in terms of employment, was the arts, entertainment, and food services industry, which accounted for 22.2 percent of the jobs in the CNMI, followed by the educational, health, and social services industry, which provided 12.4 percent of jobs.

As the Commonwealth's labor force declined and the overall unemployment rate rose, higher-income households came to account for a smaller share of households overall. The percentage

of households earning \$30,000 per year or more fell from 40.2 to 35 percent. At the same time, the share of households earning less than \$25,000 per year rose by around five percentage points. These trends were generally reflected on the islands individually, though Tinian saw an increase in the percentage of households in the low- to middle-income range, with declines the shares of households at the low and high ends of the income range.

The overall poverty rate rose between 2000 and 2010, from 46 to 52.3 percent. The highest geographic concentrations of residents living in poverty were observed on the west coast of Saipan, particularly in and around Susupe, Lower Base, and Puerto Rico. Poverty rates tended to be lower on Tinian and Rota, though there were above-average concentrations of impoverished households in and around Songsong, along with San Jose on Tinian. In 2010, block groups on the west coast of Saipan continued to hold relatively high concentrations of residents living in poverty.

Housing

More than two-thirds of occupied housing units were occupied by rental tenants in 2000, a share that grew to 71.7 percent over the following decade. The Commonwealth housing stock grew more rapidly than the number of households between the 2000 and 2010 Census counts, resulting in a higher vacancy rate at the end of the decade: 23.1 percent in 2010, up from 20 percent in 2000. A majority of vacant units were available for rent in both years. However, a relatively large share of units were classified as “other vacant”, and this share grew from 31.4 to 33.5 percent of all vacant units between 2000 and 2010. “Other vacant” units tend to be more problematic than other types of housing units, as they are not available to the marketplace and may contribute to blight where they are grouped in close geographic proximity. In 2010, the areas around Kagman had relatively high concentrations of “other vacant” units.

Though a majority of housing units in the Commonwealth were single-family units, the share of apartment units grew from 26.4 to 32 percent from 2000 through 2010 as 2,034 units were added to the housing stock. Meanwhile, single-family units declined as a share of the housing stock, from 62.3 to 58.1 percent.

The average household size declined between the 2000 and 2010 Censuses, from 3.66 persons per household to 3.26, while the number of households in the Commonwealth grew. Smaller households, i.e., those with less than five members, increased in number and as a share of all housing units in the Commonwealth as a whole, while households with five or more members represented a smaller percentage of Commonwealth households at the end of the decade.

As households decreased in size, over-crowding generally became less common. Housing units are considered overcrowded when they included between 1 and 1.5 members per room; severely overcrowded when they include more than 1.5 members per room. Around 15.4 percent of housing units were overcrowded in 2010, down from 16 percent in 2000. At the same time, the percentage of housing units that were severely overcrowded fell by half, from 28.8 to 13.6 percent.

The percentage of households lacking complete plumbing facilities also fell over the decade, from 16.4 percent of all housing units to 13.8 percent. Households are considered to have

incomplete plumbing facilities when they are missing piped hot and cold water, a flush toilet, or a bathtub or shower.

Unlike housing units with incomplete plumbing facilities, those with incomplete kitchen facilities made up a larger share of housing units in 2010 than in 2000. Kitchen facilities are considered incomplete when any of the following are missing from the unit: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator. Just over a fifth of housing units lacked complete kitchen facilities in 2010, up a percentage point from 2000.

Homeowners and renters were more likely to be cost-burdened in 2010 than they had been in 2000. Households are considered to be cost burdened when more than 30 percent of their income goes toward housing costs. In 2000, some 26.1 percent of mortgagors were cost-burdened, along with 8.8 percent of renters. By 2010, those shares had grown to 31.2 and 12.2 percent, respectively. Some 3,261 households were observed to be cost-burdened in that year. This increased incidence of cost-burdening came in spite of a marked drop in housing costs after 2000.

Review of Fair Housing Laws, Studies, and Cases

Residents of the Northern Mariana Islands are protected from discrimination in the housing market by Federal and Commonwealth laws. The Federal Fair Housing Act provides the foundation for fair housing enforcement throughout the United States and its insular areas, prohibiting discrimination in a wide range of housing transactions on the basis of race, color, religion, national origin, sex, familial status, and disability. The CNMI also prohibits discrimination on these same bases in the Commonwealth Fair Housing Law, as well as discrimination on the basis of marital status.

Housing choice in the Northern Mariana Islands is also shaped by Article XII of the Commonwealth Constitution. This article, passed in recognition of “the importance of the ownership of land for the culture and tradition of the people of the Northern Mariana Islands⁷⁹”, as well as to prevent their exploitation and promote their economic self-sufficiency, prohibits any resident without Carolinian or Chamorro ancestry from owning a long-term interest in real property on the islands. The restrictions of this article were considerably relaxed with the adoption of House Legislative Initiative in 2014: Prior to this initiative, only those who were at least one-quarter Chamorro or Carolinian were eligible to own land. At present, prospective land-owners must possess “some degree” of Chamorro or Carolinian blood.

In addition, Public Law 15-20, passed in 2006, made it possible for residents who are not of Northern Marianas descent to purchase long-term interest in housing units, provided that they are condominium units located above the ground floor.

Housing law and jurisprudence has evolved considerably since the FHA was first enacted in 1968. The Fair Housing Amendments Act of 1988 added additional protections, strengthened the Act’s relatively weak enforcement provisions, and gave the Department of Housing and Urban Development enhanced authority to enforce the Act. In addition, since the early 1970s the FHA has consistently been interpreted to apply to laws and policies that are apparently

⁷⁹ See *N.M.I. Const. art. XII* and House Legislative Initiative 18-1 (2014)

neutral with respect to protected class status, but which nevertheless “actually or predictably⁸⁰” result in discrimination. In 2013, HUD finalized a rule formalizing its interpretation of discriminatory effects liability under the FHA.

That interpretation was reaffirmed in a June 25, 2015 Supreme Court decision in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.* That case originated in a lawsuit against the Texas Department of Housing and Community Affairs (“the Department”) on the grounds that the process by which it awarded low income housing tax credits had the effect of concentrating affordable housing in areas with high concentrations of minority residents. In bringing the suit, the Inclusive Communities Project relied in part on the disparate impact theory, and it was that theory that the Department sought to challenge in asking the Supreme Court to hear the case. Ultimately, the Court held that individuals, businesses, and government agencies could be held liable for the disparate impacts of their policies.

Following on the heels of the Supreme Court decision, HUD announced a final rule significantly revamping its long-standing requirement to affirmatively further fair housing (AFFH). In developing and finalizing this rule, HUD has substantially revised the AFFH process by (1) replacing the analysis of impediments with the assessment of fair housing (AFH), (2) integrating fair housing planning into the consolidated planning process, and (3) providing a fair housing assessment tool and nationally standardized datasets, among other changes. Generally speaking, the new rule will apply to local entitlement jurisdictions that are due to begin their next five-year planning cycle in 2017 or later. For smaller entitlement jurisdictions, as well as states and insular areas, the new rule will apply to those set to begin their next planning cycle in 2018 or later. Until jurisdictions are required to submit an AFH, they are required to continue submitting analyses of impediments.

Under certain circumstances, the United States Department of Justice (DOJ) will file a fair housing complaint on behalf of residents who are suspected to have suffered a violation of fair housing law. No such complaints have been filed against housing providers, individuals, or officials in the Commonwealth in at least the last ten years.

Fair Housing Structure

Northern Mariana Islands residents who believe that they have experienced discrimination on the basis of race, color, religion, national origin, sex, disability, or familial status may file a complaint with the U.S. Department of Housing and Urban Development. Once a complaint has been filed, HUD will notify the party that has been accused of discrimination, and begin investigation of the complaint. At the same time, HUD will encourage the parties to resolve the complaint through informal conciliation. If the parties are unable to reach a conciliation agreement, HUD will issue the results of its investigation. If the agency has not found sufficient reason to believe that discrimination has occurred, it will close the investigation⁸¹. If HUD finds reasonable cause to believe that discrimination has occurred or is about to occur, the parties involved may choose to resolve the complaint through an administrative hearing, or may elect to go before a judge. Those found guilty of housing discrimination may have to pay

⁸⁰ *United States v. City of Black Jack, Missouri*, 508 F.2d 1179, 1184 (8th Cir. 1974) It was racial discrimination, specifically, that was at issue in this case.

⁸¹ HUD also closes the investigation if the parties reach a successful conciliation agreement.

finances and monetary damages, as well as mandatory fair housing training, adoption of a fair housing policy, and other measures.

In addition to its direct role in fair housing enforcement, HUD also promotes local fair housing outreach, education, investigation, and enforcement through partnerships with local agencies and organizations. Through the Fair Housing Assistance Program (FHAP), HUD offers technical and monetary assistance to government agencies that effectively enforce local fair housing laws, provided that those laws provide at least the same level of protection as the Federal Fair Housing Act (“Federal FHA”).

The Commonwealth Fair Housing Act was created in part to allow the Northern Marianas Housing Corporation to assume responsibility for fair housing enforcement; however, at present the Housing Corporation is not a participant in the FHAP. However, the Housing Corporation will accept complaints from Commonwealth residents who believe that they have experienced discrimination on any of the bases included in the Federal FHA, as well as those who may have experienced discrimination based on their marital status.

HUD also provides funding to local nonprofit organizations that conduct fair housing outreach, education, or investigation through the Fair Housing Initiatives Program (FHIP). There are currently no FHIP participants operating in the Northern Mariana Islands.

Fair Housing in the Private Sector

Housing choice is affected by a number of private-sector factors, including small business investment, attitudes and practices among housing providers, and trends in the rental housing market, home lending, and housing construction, among others.

The 2015 AI included a review of data gathered under the Community Reinvestment Act (CRA). According to those data, some 1,940 small business loans were issued in the CNMI from 2000 through 2014. Over 98 percent of these loans were issued on Saipan, totaling more than \$102 million. Census tracts along the western coast of Saipan tended to receive the most loans and loan dollars, though relatively few small business loans went to Census tracts in and around Chalan Kanoa, Chalan Piao, and San Antonio.

As noted previously, the U.S. Department of Housing and Urban Development accepts fair housing complaints from residents who believe that they have been subjected to unlawful discrimination in the housing market, as does the Corporate Director of the Northern Marianas Housing Corporation. However, neither agency has received any fair housing complaints since at least 2008.

Respondents to the 2015 Fair Housing Survey were generally unaware of any questionable practices or barrier to fair housing choice: fewer than ten percent of respondents noted that they were aware of questionable practices or barriers to fair housing choice in any of the private sector industries or areas mentioned. A majority of respondents answered “don’t know” in response to each question.

Fair Housing in the Public Sector

The ability of CNMI residents to choose where they live and obtain housing is affected by policies and practices in the public sector. The 2015 AI effort included a review several factors, including the location of assisted housing units, the 2013 Saipan Zoning Law, and public awareness of fair housing issues in land use and zoning policy, accessible design standards, the provision of public services, and other areas.

The U.S. Department of Housing and Urban Development provides rental assistance low-income residents of the CNMI through the Housing Choice Voucher program. This program, which is administered locally by the Northern Marianas Housing Corporation, makes portable housing subsidies available to qualified residents, allowing them to choose housing in any location where the landlord accepts the subsidy. There are currently around three-hundred housing choice vouchers in use throughout the commonwealth. Most of these are on Saipan, the most populous island, and they are generally more highly concentrated in the more populous areas of the island.

Analysis of the public sector in the context of fair housing also included a review of the Saipan Zoning Law of 2013. This analysis did not reveal notable, overt barriers to fair housing choice; however, some elements were missing that might serve to promote broader access to housing. For example, conditional-use permits are required for institutional use permits, a classification which includes group homes and other types of supportive housing.

As was the case with the private sector portion of the 2015 Fair Housing Survey, those who responded to questions concerning the public sector were generally unaware of any questionable practices or barriers to fair housing choice in any public sector policies or practices. Limitations in access to government services was the most salient challenge from a fair housing perspective, but even those who were aware of fair housing issues in this area accounted for a small minority of survey respondents at 6.5 percent. Three of the seven who went on to identify specific issues relating to limitations in government services cited a lack of public transportation. More than seventy percent of respondents answered each question in this section with “don’t know.”

Public Involvement

During the 2015 AI process, the Commonwealth encouraged participation in fair housing planning through the 2015 Fair Housing Survey and a public meeting, held in November of 2015, in which findings from the AI were presented to stakeholders and citizens.

The 2015 Fair Housing Survey, along with efforts to disseminate and promote participation in the survey, constituted a large part of the public involvement efforts during the AI process. Respondents to the survey included service providers, advocates/service providers, construction and development professionals, local government officials, real estate professionals, and others. Nearly two-thirds of survey respondents were renters, and a clear majority considered themselves to be unfamiliar with fair housing laws.

However, nearly half of survey respondents considered fair housing laws to be useful, though around 18 percent felt that those laws are difficult to understand or follow. There was limited

support for extending additional fair housing protections, with some respondents citing a need for protections for non-native residents or workers, and others identifying a need to protect local residents in fair housing laws. Around 41 percent felt that fair housing laws are not adequately enforced, and only 11 percent of respondents felt that they were adequately enforced.

Few respondents, or around eleven percent, were aware of any existing fair housing training process, and fewer still had participated in such training. There was broad agreement that current fair housing outreach and education activity was insufficient, and few respondents were aware of any fair housing testing in the Commonwealth.

No more than 17.6 percent of respondents were able to correctly identify groups protected under the Federal or Commonwealth Fair Housing Act: this percentage of respondents correctly identified “religion” as a protected class, and a similar share identified “national origin.” However, a similar share also identified “income” as a protected class, which is not protected under Federal or commonwealth fair housing laws. In addition, more than a fifth of respondents cited “age” as a protected class, which is not protected under general fair housing provisions at the Federal or local level. Fewer than five percent of respondents were aware of any local fair housing ordinance, regulation, or plan.

A formal presentation of findings from the 2015 AI process is scheduled for November of 2015. The content of the meeting and any subsequent discussions or additional information will be included in the final report.

SECTION IX. IMPEDIMENTS AND SUGGESTED ACTIONS

Private Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: People who are not of Northern Marianas Descent (NMD), and who are subject to legal restrictions on their ability to own land, tend to be concentrated in areas with high shares of rental housing. This impediment was identified through review of Article XII of the Commonwealth Constitution, as well as through geographic analyses of the Commonwealth population and housing stock.

Action 1.1: Seek avenues to promote a greater balance of owner- and renter-occupied housing throughout the Commonwealth, including policies to encourage the development of rental housing in areas currently dominated by owner-occupied housing.

Measurable Objective 1.1: The identification of methods to promote a greater balance of renter- and owner-occupied housing.

Action 1.2: In future housing development, promote the development of multi-story owner-occupied condominium units that allow for ownership by non-NMD residents in areas with high concentrations of single-family, owner-occupied housing.

Measurable Objective 1.2: Measures taken to promote multi-story condominium development in areas with high concentrations of owner-occupied housing.

Impediment 2: Lack of fair housing complaint activity. This impediment was identified in correspondence with representatives from HUD and the Northern Marianas Housing Corporation, as well as in the lack of housing complaints that either agency has received from Commonwealth residents.

Action 2.1: Conduct outreach and education activities to promote awareness of fair housing laws and the legal remedies available to those who believe that they have experienced discrimination in the housing market.

Measurable Objective 2.1: The number of outreach and education activities conducted and the number of participants in those activities.

Impediment 3: Need to create legal avenues available to Commonwealth residents who believe that they have experienced housing discrimination. This impediment was identified in the lack of fair housing complaint data and through review of the Northern Marianas fair housing infrastructure.

Action 1.1: Explore possibilities for public-private partnerships, with local legal system, to provide fair housing services including outreach, education, and enforcement.

Measurable Objective 1.1: The identification of potential partners, an assessment of the types of services that these partnerships could offer, and the establishment of any partnerships focusing on fair housing issues.

Public Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: Need to strengthen the local fair housing infrastructure. This impediment was identified through review of the fair housing agencies and organizations serving commonwealth residents, contact with the U.S. Department of Housing and Urban Development, and results of the 2015 Fair Housing Survey.

Action 1.1: Name a fair housing officer who, operating under the authority granted the Corporate Director of the Northern Marianas Housing Corporation by the Commonwealth Fair Housing Act, will accept housing discrimination complaints for investigation and enforcement.

Measurable Objective 1.1: The naming, or creation and filling, of the position of fair housing officer.

Action 1.2: Publicize the responsibilities of the Fair Housing Officer in print and online media, including the Housing Corporation website.

Measurable Objective 1.2: Publication materials relating to the fair housing officer, and the number and type of media outlets in which the position is publicized.

Action 1.3: Task the fair housing officer with conducting or promoting fair housing outreach, education, and training activities in the Commonwealth.

Measurable Objective 1.3: The number of outreach and education activities conducted under the auspices of the Fair Housing Office, the number of participants in those activities, and the level of resources dedicated to fair housing outreach and education.

Impediment 2: Lack of knowledge of fair housing rights and obligations on the part of housing providers and consumers. This impediment was identified through review of responses to the 2015 Fair Housing Survey.

Action 2.1: Conduct fair housing outreach and education targeting rental tenants, providing an overview of fair housing laws and examples of discrimination that housing consumers may encounter in the rental housing market.

Measurable Objective 2.1: The number of fair housing outreach and education activities conducted, and the number of participants in those activities.

Action 2.2: Include a discussion of the Commonwealth Fair Housing Act on the Housing Corporation's Fair Housing webpage, and update hyperlinks to fair housing complaint forms.

Measurable Objective 2.2: The inclusion of additional narrative on the Housing Corporation's Fair Housing webpage and updated hyperlinks.

Impediment 3: Lack of Northern Marianas Housing Corporation certification as “substantially equivalent” for the purposes of the Fair Housing Assistance Program (FHAP). This impediment was identified through review of the Northern Marianas fair housing infrastructure.

Action 3.1: In year three of the Five-Year AI Action Plan, direct the Fair Housing Officer to compile data concerning fair housing complaint processing and enforcement activities that the Office has conducted in the first two years of the Action Plan period and present those data to HUD as part of an application for substantially equivalent status.

Measurable Objective 3.1: Data gathered for submission to HUD, submittal of the data, and HUD’s response.

SECTION X. GLOSSARY

Accessible housing: Housing designed to allow easier access for physically disabled or vision impaired persons.

AI: Analysis of Impediments to Fair Housing Choice

AMI: Area median income

BEA: Bureau of Economic Analysis

BLS: Bureau of Labor Statistics

CDBG: Community Development Block Grant

Census tract: Census tract boundaries are updated with each decennial census. They are drawn based on population size and ideally represent approximately the same number of persons for each tract.

Consolidated Plan: Consolidated Plan for Housing and Community Development

Cost burden: Occurs when a household has gross housing costs that range from 30.1 to 50 percent of gross household income.

CRA: Community Reinvestment Act

Disability: A lasting physical, mental, or emotional condition that makes it difficult for a person to conduct daily activities of living or impedes him or her from being able to go outside the home alone or to work.

Disproportionate share: Exists when the percentage of a population is 10 percentage points or more above the study area average.

DOJ: U.S. Department of Justice

ESG: Emergency Shelter Grants program

Fannie Mae: Federal National Mortgage Association (FNMA), a government-sponsored enterprise that purchases mortgages from lenders and repackages them as mortgage-backed securities for investors.

Family: A family is a group of two people or more related by birth, marriage, or adoption and residing together.

FFIEC: Federal Financial Institutions Examination Council

FHAP: Fair Housing Assistance Program

FHEO: Fair Housing and Equal Opportunity

FHIP: Fair Housing Initiative Program

Floor area ratio: The ratio of the total floor area of a building to the land on which it is situated, or the limit imposed on such a ratio.

Freddie Mac: Federal Home Loan Mortgage Corporation (FHLMC), a government-sponsored enterprise that purchases mortgages from lenders and repackages them as mortgage-backed securities for investors.

GAO: U.S. General Accounting Office

Gross housing costs: For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent and electricity or natural gas energy charges.

HAL: High annual percentage rate (APR) loan, defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.⁸²

HOME: HOME Investment Partnerships

HOPWA: Housing Opportunities for Persons with AIDS

Household: A household consists of all the people who occupy a housing unit. A house, an apartment or other group of rooms, or a single room, is regarded as a housing unit when it is occupied or intended for occupancy as separate living quarters; that is, when the occupants do not live with any other persons in the structure and there is direct access from the outside or through a common hall.

Housing problems: Overcrowding, incomplete plumbing or kitchen facilities, or cost burdens

HUD: U.S. Department of Housing and Urban Development

Incomplete kitchen facilities: A housing unit is classified as lacking complete kitchen facilities when any of the following are not present: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator.

Incomplete plumbing facilities: A housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower.

Labor force: The total number of persons working or looking for work

MFI: Median family income

Mixed-use development: The use of a building, set of buildings, or neighborhood for more than one purpose.

MSA: Metropolitan Statistical Area

NIMBYism: "Not in my backyard" mentality among community members, often in protest of affordable or multi-family housing.

Other vacant units: Housing units that are not for sale or rent

Overcrowding: Overcrowding occurs when a housing unit has more than one to 1.5 persons per room.

Poverty: The Census Bureau uses a set of money income thresholds that vary by family size and composition to determine who is in poverty. If a family's total income is less than the family's threshold, then that family and every individual in it is considered in poverty. The official poverty thresholds do not vary geographically, but they are updated for inflation using Consumer Price Index (CPI-U). The official poverty definition uses money income before taxes and does not include capital gains or noncash benefits (such as public housing, Medicaid, and food stamps).

Predatory loans: As defined by the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA), loans are considered predatory based on:

1. If they are HOEPA loans;⁸³
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of HALs. For full definition, see **HAL**.

Protected Class: Group of people protected from discrimination and harassment. Commonwealth residents are protected from housing discrimination based on race, sex, religion, familial status, disability, national origin, color, and marital status.

⁸² 12 CFR Part 203, http://www.ffiec.gov/hmda/pdf/regc_020702.pdf

⁸³ Loans are subject to the HOEPA if they impose rates or fees above a certain threshold set by the Federal Reserve Board. "HMDA Glossary." <http://www.ffiec.gov/hmda/glossary.htm#H>

Public housing: Public housing was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities.

RDA: Redevelopment agency

Severe cost burden: Occurs when gross housing costs represent 50.1 percent or more of gross household income.

Severe overcrowding: Occurs when a housing unit has more than 1.5 persons per room.

Steering: Actions of real estate agents or landlords to discourage a prospective buyer or tenant from seeing or selecting properties in certain areas due to their racial or ethnic composition.

Tenure: The status by which a housing unit is held. A housing unit is "owned" if the owner or co-owner lives in the unit, even if it is mortgaged or not fully paid for. A cooperative or condominium unit is "owned" only if the owner or co-owner lives in it. All other occupied units are classified as "rented," including units rented for cash rent and those occupied without payment of cash rent.

APPENDICES

The following sections present additional data prepared in development of the Commonwealth of the Northern Mariana Islands Analysis of Impediments to Fair Housing Choice.

A. CENSUS TABLES FOR SAIPAN, TINIAN, AND ROTA

DEMOGRAPHICS

Table A.1.A
Population by Age
Saipan Municipality
2000 & 2010 Census

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	5,103	8.2%	4,349	9.0%	-14.8%
5 to 19	12,016	19.3%	12,381	25.7%	3.0%
20 to 24	7,190	11.5%	2,436	5.1%	-66.1%
25 to 34	18,529	29.7%	6,140	12.7%	-66.9%
35 to 54	16,821	27.0%	17,770	36.9%	5.6%
55 to 64	1,836	2.9%	3,728	7.7%	103.1%
65 or Older	897	1.4%	1,416	2.9%	57.9%
Total	62,392	100.0%	48,220	100.0%	-22.7%

Table A.1.B
Population by Age
Tinian Municipality
2000 & 2010 Census

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	321	9.1%	275	8.8%	-14.3%
5 to 19	847	23.9%	727	23.2%	-14.2%
20 to 24	210	5.9%	150	4.8%	-28.6%
25 to 34	965	27.3%	484	15.4%	-49.8%
35 to 54	1,048	29.6%	1,238	39.5%	18.1%
55 to 64	87	2.5%	201	6.4%	131.0%
65 or Older	62	1.8%	61	1.9%	-1.6%
Total	3,540	100.0%	3,136	100.0%	-11.4%

Table A.1.C
Population by Age
Rota Municipality
2000 & 2010 Census

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	368	11.2%	203	8.0%	-44.8%
5 to 19	874	26.6%	676	26.8%	-22.7%
20 to 24	166	5.1%	84	3.3%	-49.4%
25 to 34	686	20.9%	301	11.9%	-56.1%
35 to 54	988	30.1%	947	37.5%	-4.1%
55 to 64	113	3.4%	227	9.0%	100.9%
65 or Older	88	2.7%	89	3.5%	1.1%
Total	3,283	100.0%	2,527	100.0%	-23.0%

Table A.2.A
Elderly Population by Age
 Saipan Municipality
 2000 & 2010 Census

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	183	20.4%	290	20.5%	58.5%
67 to 69	246	27.4%	344	24.3%	39.8%
70 to 74	216	24.1%	403	28.5%	86.6%
75 to 79	133	14.8%	225	15.9%	69.2%
80 to 84	65	7.2%	107	7.6%	64.6%
85 or Older	54	6.0%	47	3.3%	-13.0%
Total	897	100.0%	1,416	100.0%	57.9%

Table A.2.B
Elderly Population by Age
 Tinian Municipality
 2000 & 2010 Census

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	11	17.7%	11	18.0%	0.0%
67 to 69	12	19.4%	13	21.3%	8.3%
70 to 74	22	35.5%	20	32.8%	-9.1%
75 to 79	9	14.5%	8	13.1%	-11.1%
80 to 84	4	6.5%	4	6.6%	0.0%
85 or Older	4	6.5%	5	8.2%	25.0%
Total	62	100.0%	61	100.0%	-1.6%

Table A.2.C
Elderly Population by Age
 Rota Municipality
 2000 & 2010 Census

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	11	12.5%	19	21.3%	72.7%
67 to 69	23	26.1%	22	24.7%	-4.3%
70 to 74	24	27.3%	17	19.1%	-29.2%
75 to 79	11	12.5%	17	19.1%	54.5%
80 to 84	11	12.5%	9	10.1%	-18.2%
85 or Older	8	9.1%	5	5.6%	-37.5%
Total	88	100.0%	89	100.0%	1.1%

Table A.3.A
Group Quarters Population
Saipan Municipality
2000 & 2010 Census Data

2000 & 2010 Census Data					
Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	84	91.3%	125	94.0%	48.8%
Juvenile Facilities	0	0.0%	7	5.3%	-
Nursing Homes	0	0.0%	0	0.0%	-
Other Institutions	8	8.7%	1	.8%	-87.5%
Total	92	100.0%	133	100.0%	44.6%
Noninstitutionalized					
College Dormitories	0	0.0%	162	15.9%	-
Military Quarters	0	0.0%	0	.0%	-
Other Noninstitutional	16,738	0.0%	859	84.1%	-94.9%
Total	0	0.0%	1,021	88.5%	-
Group Quarters Population	16,830	100.0%	1,154	100.0%	-93.1%

Table A.3.B
Group Quarters Population
Tinian Municipality
2000 & 2010 Census Data

2000 & 2010 Census Data					
Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	0	0.0%	0	0.0%	-
Juvenile Facilities	0	0.0%	0	0.0%	-
Nursing Homes	0	0.0%	0	0.0%	-
Other Institutions	0	0.0%	0	0.0%	-
Total	0	100.0%	0	100.0%	-
Noninstitutionalized					
College Dormitories	0	0.0%	0	0.0%	-
Military Quarters	0	0.0%	0	0.0%	-
Other Noninstitutional	681	0.0%	334	100.0%	-51.0%
Total	0	.0%	334	100.0%	-
Group Quarters Population	681	100.0%	334	100.0%	-51.0%

Table A.3.C
Group Quarters Population
Rota Municipality
2000 & 2010 Census Data

2000 & 2010 Census Data					
Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	0	0.0%	0	0.0%	-
Juvenile Facilities	0	0.0%	0	0.0%	-
Nursing Homes	0	0.0%	0	0.0%	-
Other Institutions	0	0.0%	0	0.0%	-
Total	0	0.0%	0	0.0%	-
Noninstitutionalized					
College Dormitories	0	0.0%	0	0.0%	-
Military Quarters	0	0.0%	0	0.0%	-
Other Noninstitutional	280	0.0%	83	100.0%	-70.4%
Total	0	0.0%	83	100.0%	-
Group Quarters Population	280	100.0%	83	100.0%	-70.4%

Table A.4.A
Population by Race and Ethnicity

Saipan Municipality
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Population of One Ethnic Origin or Race:	59,641	95.6%	41,993	87.1%	-29.6%
Native Hawaiian and Other Pacific Islander	21,697	36.4%	16,210	38.6%	-25.3%
Carolinian	.	.	2,446	15.1%	.
Chamorro	.	.	10,411	64.2%	.
Chuukese	.	.	1,225	7.6%	.
Kosraean	.	.	36	0.2%	.
Marshallese	.	.	67	0.4%	.
Palauan	.	.	1,128	7.0%	.
Pohnpeian	.	.	411	2.5%	.
Yapese	.	.	219	1.4%	.
Other Pacific Islander	.	.	267	1.6%	.
Asian	36,309	60.9%	24,562	58.5%	-32.4%
Bangladeshi	.	.	382	1.6%	.
Chinese	.	.	3,419	13.9%	.
Filipino	.	.	17,285	70.4%	.
Japanese	.	.	738	3.0%	.
Korean	.	.	2,202	9.0%	.
Nepalese	.	.	129	0.5%	.
Thai	.	.	256	1.0%	.
Other Asian	.	.	151	0.6%	.
White	1,150	1.9%	1,021	2.4%	-11.2%
Black	35	0.1%	45	0.1%	28.6%
Hispanic	.	.	46	0.1%	.
Population of Two Ethnic Origins or Races:	2,751	4.4%	6,227	12.9%	126.4%
Total	62,392	100.0%	48,220	100.0%	-22.7%

Table A.4.B
Population by Race and Ethnicity
Tinian Municipality
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Population of One Ethnic Origin or Race:	3,180	89.8%	2,762	88.1%	-13.1%
Native Hawaiian and Other Pacific Islander	1,477	46.4%	1,222	44.2%	-17.3%
Carolinian	.	.	10	0.8%	.
Chamorro	.	.	1,183	96.8%	.
Chuukese	.	.	7	0.6%	.
Kosraean	.	.	1	0.1%	.
Marshallese	.	.	0	0.0%	.
Palauan	.	.	12	1.0%	.
Pohnpeian	.	.	2	0.2%	.
Yapese	.	.	6	0.5%	.
Other Pacific Islander	.	.	1	0.1%	.
Asian	1,593	50.1%	1,463	53.0%	-8.2%
Bangladeshi	.	.	55	3.8%	.
Chinese	.	.	237	16.2%	.
Filipino	.	.	950	64.9%	.
Japanese	.	.	37	2.5%	.
Korean	.	.	42	2.9%	.
Nepalese	.	.	97	6.6%	.
Thai	.	.	9	0.6%	.
Other Asian	.	.	36	2.5%	.
White	73	2.3%	57	2.1%	-21.9%
Black	4	0.1%	6	0.2%	50.0%
Hispanic	.	.	6	0.2%	.
Population of Two Ethnic Origins or Races:	360	10.2%	374	11.9%	3.9%
Total	3,540	100.0%	3,136	100.0%	-11.4%

Table A.4.C
Population by Race and Ethnicity
Rota Municipality
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Population of One Ethnic Origin or Race:	3,061	93.2%	2,296	90.9%	-25.0%
Native Hawaiian and Other Pacific Islander	1,948	63.6%	1,368	59.6%	-29.8%
Carolinian	.	.	5	0.4%	.
Chamorro	.	.	1,308	95.6%	.
Chuukese	.	.	10	0.7%	.
Kosraean	.	.	0	0.0%	.
Marshallese	.	.	1	0.1%	.
Palauan	.	.	29	2.1%	.
Pohnpeian	.	.	12	0.9%	.
Yapese	.	.	3	0.2%	.
Other Pacific Islander	.	.	0	0.0%	.
Asian	1,050	34.3%	883	38.5%	-15.9%
Bangladeshi	.	.	64	7.2%	.
Chinese	.	.	3	0.3%	.
Filipino	.	.	782	88.6%	.
Japanese	.	.	20	2.3%	.
Korean	.	.	9	1.0%	.
Nepalese	.	.	1	0.1%	.
Thai	.	.	1	0.1%	.
Other Asian	.	.	3	0.3%	.
White	51	1.7%	39	1.7%	-23.5%
Black	4	0.1%	4	0.2%	0.0%
Hispanic	.	.	2	0.1%	.
Population of Two Ethnic Origins or Races:	222	6.8%	231	9.1%	4.1%
Total	3,283	100.0%	2,527	100.0%	-23.0%

Table A.5.A
Disability by Age
Saipan Municipality
2000 Census

Age	Total	
	Disabled Population	Disability Rate
5 to 15	224	2.5%
16 to 64	7,607	19.2%
65 and older	463	51.6%
Total	8,294	14.5%

Table A.5.B
Disability by Age
Tinian Municipality
2000 Census

Age	Total	
	Disabled Population	Disability Rate
5 to 15	10	1.5%
16 to 64	443	21.8%
65 and older	32	51.6%
Total	485	15.1%

Table A.5.C
Disability by Age
Rota Municipality
2000 Census

Age	Total	
	Disabled Population	Disability Rate
5 to 15	18	2.6%
16 to 64	226	11.9%
65 and older	41	46.6%
Total	285	9.8%

Table A.6.A
Disability by Age
Saipan Municipality
2010 Census

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	11	0.5%	12	0.6%	23	0.5%
5 to 17	219	3.8%	165	3.1%	384	3.5%
18 to 34	186	4.0%	157	3.0%	343	3.5%
35 to 64	672	6.0%	738	7.3%	1,410	6.6%
65 to 74	156	26.5%	161	36.1%	317	30.6%
75 or Older	90	51.7%	126	61.5%	216	57.0%
Total	1,334	5.4%	1,359	5.8%	2,693	5.6%

Table A.6.B
Disability by Age
Tinian Municipality
2010 Census

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	0	0.0%	0	0.0%	0	0.0%
5 to 17	9	2.7%	9	2.8%	18	2.7%
18 to 34	7	2.1%	8	2.2%	15	2.1%
35 to 64	37	4.5%	16	2.6%	53	3.7%
65 to 74	3	20.0%	15	51.7%	18	40.9%
75 or Older	6	60.0%	5	71.4%	11	64.7%
Total	62	3.7%	53	3.6%	115	3.7%

Table A.6.C
Disability by Age
Rota Municipality
2010 Census

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	0	0.0%	0	0.0%	0	0.0%
5 to 17	14	4.5%	10	3.2%	24	3.8%
18 to 34	7	3.3%	5	2.2%	12	2.8%
35 to 64	40	6.0%	32	6.3%	72	6.1%
65 to 74	7	21.9%	8	30.8%	15	25.9%
75 or Older	5	38.5%	13	72.2%	18	58.1%
Total	73	5.5%	68	5.7%	141	5.6%

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Table A.7.A
Employment Status for the Population 16 Years and Over

Saipan Municipality
2000 & 2010 Census Data

Industry	2000 Census	2010 Census	% Change 00–10
Employed	39,223	21,816	-44.4%
Unemployed	1,406	2,893	105.8%
Civilian Labor Force	40,629	24,709	-39.2%
Unemployment Rate	3.5%	11.7%	8.2% Points

Table A.7.B
Employment Status for the Population 16 Years and Over

Tinian Municipality
2000 & 2010 Census Data

Industry	2000 Census	2010 Census	% Change 00–10
Employed	1,938	1,752	-9.6%
Unemployed	161	126	-21.7%
Civilian Labor Force	2,099	1,878	-10.5%
Unemployment Rate	7.7%	6.7%	-1.0% Points

Table A.7.C
Employment Status for the Population 16 Years and Over

Rota Municipality
2000 & 2010 Census Data

Industry	2000 Census	2010 Census	% Change 00–10
Employed	1,591	1,258	-20.9%
Unemployed	145	104	-28.3%
Civilian Labor Force	1,736	1,362	-21.5%
Unemployment Rate	8.4%	7.6%	-0.7% Points

Table A.8.A
Sex by Employment Status for the Population 16 Years and Over

Saipan Municipality
2000 & 2010 Census Data

Industry	2000 Census		2010 Census		% Change 00–10
	Persons	% of Total	Persons	% of Total	
Male:	20,829	43.3%	17,697	51.2%	-15.0%
In Labor Force:	18,059	86.7%	13,615	76.9%	-24.6%
In Armed Forces	5	0.0%	13	0.1%	160.0%
Civilian:	18,054	100.0%	13,602	99.9%	-24.7%
Employed	17,328	96.0%	12,223	89.9%	-29.5%
Unemployed	726	4.0%	1,379	10.1%	89.9%
Not in Labor Force	2,770	13.3%	4,082	23.1%	47.4%
Female:	27,313	56.7%	16,884	48.8%	-38.2%
In Labor Force:	22,575	82.7%	11,111	65.8%	-50.8%
In Armed Forces	0	0.0%	4	0.0%	-
Civilian:	22,575	100.0%	11,107	100.0%	-50.8%
Employed	21,895	97.0%	9,593	86.4%	-56.2%
Unemployed	680	3.0%	1,514	13.6%	122.6%
Not in Labor Force	4,738	17.3%	5,773	34.2%	21.8%
Total	48,142	100.0%	34,581	100.0%	-28.2%

Table A.8.B
Sex by Employment Status for the Population 16 Years and Over

Tinian Municipality
2000 & 2010 Census Data

Industry	2000 Census		2010 Census		% Change 00-10
	Persons	% of Total	Persons	% of Total	
Male:	1,449	57.0%	1,243	53.8%	-14.2%
In Labor Force:	1,258	86.8%	1,074	86.4%	-14.6%
In Armed Forces	0	0.0%	0	0.0%	%
Civilian:	1,258	100.0%	1,074	100.0%	-14.6%
Employed	1,166	92.7%	1,016	94.6%	-12.9%
Unemployed	92	7.3%	58	5.4%	-37.0%
Not in Labor Force	191	13.2%	169	13.6%	-11.5%
Female:	1,093	43.0%	1,068	46.2%	-2.3%
In Labor Force:	842	77.0%	804	75.3%	-4.5%
In Armed Forces	1	0.1%	0	0.0%	-100.0%
Civilian:	841	99.9%	804	100.0%	-4.4%
Employed	772	91.8%	736	91.5%	-4.7%
Unemployed	69	8.2%	68	8.5%	-1.4%
Not in Labor Force	251	23.0%	264	24.7%	5.2%
Total	2,542	100.0%	2,311	100.0%	-9.1%

Table A.8.C
Sex by Employment Status for the Population 16 Years and Over

Rota Municipality
2000 & 2010 Census Data

Industry	2000 Census		2010 Census		% Change 00-10
	Persons	% of Total	Persons	% of Total	
Male:	1,262	57.1%	969	54.2%	-23.2%
In Labor Force:	1,060	84.0%	781	80.6%	-26.3%
In Armed Forces	0	0.0%	2	0.3%	-
Civilian:	1,060	100.0%	779	99.7%	-26.5%
Employed	990	93.4%	723	92.8%	-27.0%
Unemployed	70	6.6%	56	7.2%	-20.0%
Not in Labor Force	202	16.0%	188	19.4%	-6.9%
Female:	947	42.9%	818	45.8%	-13.6%
In Labor Force:	676	71.4%	583	71.3%	-13.8%
In Armed Forces	0	0.0%	0	0.0%	-
Civilian:	676	100.0%	583	100.0%	-13.8%
Employed	601	88.9%	535	91.8%	-11.0%
Unemployed	75	11.1%	48	8.2%	-36.0%
Not in Labor Force	271	28.6%	235	28.7%	-13.3%
Total	2,209	100.0%	1,787	100.0%	-19.1%

Table A.9.A
Industry For the Employed Civilian Population
 Saipan Municipality
 2000 & 2010 Census Data

Industry	2000 Census		2010 Census		% Change 00–10
	Persons	% of Total	Persons	% of Total	
Agriculture, Forestry, Fishing, and Mining	445	1.1%	369	1.7%	-17.1%
Construction	2,410	6.1%	1,554	7.1%	-35.5%
Manufacturing	17,329	44.2%	663	3.0%	-96.2%
Wholesale Trade	665	1.7%	683	3.1%	2.7%
Retail Trade	2,858	7.3%	2,488	11.4%	-12.9%
Transportation, Warehousing and Utilities	1,282	3.3%	1,241	5.7%	-3.2%
Information	560	1.4%	462	2.1%	-17.5%
Finance, Insurance and Real Estate	940	2.4%	1,003	4.6%	6.7%
Professional, Scientific, and Management Services	2,062	5.3%	1,884	8.6%	-8.6%
Educational, Health, and Social Services	1,882	4.8%	2,689	12.3%	42.9%
Arts, Entertainment and Food Services	4,714	12.0%	4,623	21.2%	-1.9%
Other Services	2,116	5.4%	2,315	10.6%	9.4%
Public Administration	1,960	5.0%	1,842	8.4%	-6.0%
Total Working Population	39,223	100%	21,816	100%	-44.4%

Table A.9.B
Industry For the Employed Civilian Population
 Tinian Municipality
 2000 & 2010 Census Data

Industry	2000 Census		2010 Census		% Change 00–10
	Persons	% of Total	Persons	% of Total	
Agriculture, Forestry, Fishing, and Mining	64	3.3%	41	2.3%	-35.9%
Construction	170	8.8%	79	4.5%	-53.5%
Manufacturing	51	2.6%	5	0.3%	-90.2%
Wholesale Trade	9	0.5%	10	0.6%	11.1%
Retail Trade	89	4.6%	76	4.3%	-14.6%
Transportation, Warehousing and Utilities	100	5.2%	127	7.2%	27.0%
Information	38	2.0%	29	1.7%	-23.7%
Finance, Insurance and Real Estate	39	2.0%	31	1.8%	-20.5%
Professional, Scientific, and Management Services	36	1.9%	53	3.0%	47.2%
Educational, Health, and Social Services	160	8.3%	178	10.2%	11.3%
Arts, Entertainment and Food Services	796	41.1%	672	38.4%	-15.6%
Other Services	97	5.0%	131	7.5%	35.1%
Public Administration	289	14.9%	320	18.3%	10.7%
Total Working Population	1,938	100%	1,752	100%	-9.6%

Table A.9.C
Industry For the Employed Civilian Population

Rota Municipality
2000 & 2010 Census Data

Industry	2000 Census		2010 Census		% Change 00-10
	Persons	% of Total	Persons	% of Total	
Agriculture, Forestry, Fishing, and Mining	114	7.2%	62	4.9%	-45.6%
Construction	205	12.9%	153	12.2%	-25.4%
Manufacturing	18	1.1%	21	1.7%	16.7%
Wholesale Trade	6	0.4%	7	0.6%	16.7%
Retail Trade	109	6.9%	81	6.4%	-25.7%
Transportation, Warehousing and Utilities	67	4.2%	61	4.8%	-9.0%
Information	5	0.3%	5	0.4%	0.0%
Finance, Insurance and Real Estate	34	2.1%	30	2.4%	-11.8%
Professional, Scientific, and Management Services	18	1.1%	37	2.9%	105.6%
Educational, Health, and Social Services	197	12.4%	218	17.3%	10.7%
Arts, Entertainment and Food Services	324	20.4%	224	17.8%	-30.9%
Other Services	160	10.1%	107	8.5%	-33.1%
Public Administration	334	21.0%	252	20.0%	-24.6%
Total Working Population	1,591	100%	1,258	100%	-20.9%

Table A.10.A
Households by Income

Saipan Municipality
2000 and 2010 Census

Income	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
Less than \$5,000	798	6.4%	1,363	9.5%	70.8%
\$5,000 to \$9,999	1,773	14.2%	2,314	16.1%	30.5%
\$10,000 to \$14,999	1,718	13.7%	1,895	13.2%	10.3%
\$15,000 to \$19,999	1,386	11.1%	1,753	12.2%	26.5%
\$20,000 to \$24,999	1,089	8.7%	1,270	8.8%	16.6%
\$25,000 to \$29,999	804	6.4%	875	6.1%	8.8%
\$30,000 to \$49,999	2,376	19.0%	2,297	15.9%	-3.3%
\$50,000 to \$74,999	1,334	10.7%	1,373	9.5%	2.9%
\$75,000 to \$99,999	572	4.6%	588	4.1%	2.8%
\$100,000 or More	657	5.3%	678	4.7%	3.2%
Total	12,507	100.0%	14,406	100.0%	15.2%

Table A.10.B
Households by Income

Tinian Municipality
2000 and 2010 Census

Income	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
Less than \$5,000	78	9.9%	49	5.6%	-37.2%
\$5,000 to \$9,999	117	14.8%	121	13.8%	3.4%
\$10,000 to \$14,999	90	11.4%	90	10.3%	0.0%
\$15,000 to \$19,999	74	9.4%	109	12.5%	47.3%
\$20,000 to \$24,999	50	6.3%	75	8.6%	50.0%
\$25,000 to \$29,999	45	5.7%	53	6.1%	17.8%
\$30,000 to \$49,999	137	17.3%	200	22.9%	46.0%
\$50,000 to \$74,999	108	13.7%	100	11.4%	-7.4%
\$75,000 to \$99,999	44	5.6%	46	5.3%	4.5%
\$100,000 or More	47	5.9%	31	3.5%	-34.0%
Total	790	100.0%	874	100.0%	10.6%

Table A.10.C
Households by Income
Rota Municipality
2000 and 2010 Census

Income	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
Less than \$5,000	42	5.5%	49	6.5%	16.7%
\$5,000 to \$9,999	71	9.4%	94	12.5%	32.4%
\$10,000 to \$14,999	84	11.1%	112	14.8%	33.3%
\$15,000 to \$19,999	80	10.6%	83	11.0%	3.8%
\$20,000 to \$24,999	56	7.4%	59	7.8%	5.4%
\$25,000 to \$29,999	61	8.1%	54	7.2%	-11.5%
\$30,000 to \$49,999	171	22.6%	156	20.7%	-8.8%
\$50,000 to \$74,999	114	15.1%	84	11.1%	-26.3%
\$75,000 to \$99,999	28	3.7%	39	5.2%	39.3%
\$100,000 or More	50	6.6%	25	3.3%	-50.0%
Total	757	100.0%	755	100.0%	-0.3%

Table A.11.A
Poverty by Age
Saipan Municipality
2000 and 2010 Census

Age	2000 Census		2010 Census		% Change 00–10
	Persons in Poverty	% of Total	Persons in Poverty	% of Total	
Under 6	2,450	8.4%	3,023	11.9%	23.4%
6 to 17	3,498	12.0%	5,526	21.7%	58.0%
18 to 64	22,906	78.7%	16,428	64.6%	-28.3%
65 or Older	242	0.8%	462	1.8%	90.9%
Total	29,096	100.0%	25,439	100.0%	-12.6%
Poverty Rate	46.9%	.	53.3%	.	6.4% Points

Table A.11.B
Poverty by Age
Tinian Municipality
2000 and 2010 Census

Age	2000 Census		2010 Census		% Change 00–10
	Persons in Poverty	% of Total	Persons in Poverty	% of Total	
Under 6	129	8.9%	155	11.4%	20.2%
6 to 17	194	13.4%	247	18.1%	27.3%
18 to 64	1,117	76.9%	948	69.5%	-15.1%
65 or Older	12	0.8%	14	1.0%	16.7%
Total	1,452	100.0%	1,364	100.0%	-6.1%
Poverty Rate	41.2%	.	43.6%	.	2.5% Points

Table A.11.C
Poverty by Age
Rota Municipality
2000 and 2010 Census

Age	2000 Census		2010 Census		% Change 00–10
	Persons in Poverty	% of Total	Persons in Poverty	% of Total	
Under 6	136	12.2%	113	10.1%	-16.9%
6 to 17	169	15.2%	253	22.6%	49.7%
18 to 64	788	70.9%	726	64.9%	-7.9%
65 or Older	18	1.6%	26	2.3%	44.4%
Total	1,111	100.0%	1,118	100.0%	.6%
Poverty Rate	34.2%	.	44.4%	.	10.2% Points

HOUSING

Table A.12.A
Housing Units by Tenure

Saipan Municipality
2000 & 2010 Census

Tenure	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	12,507	80.6%	14,406	77.1%	15.2%
Owner-Occupied	3,878	31.0%	3,906	27.1%	0.7%
Renter-Occupied	8,629	69.0%	10,500	72.9%	21.7%
Vacant Housing Units	3,020	19.4%	4,277	22.9%	41.6%
Total Housing Units	15,527	100.0%	18,683	100.0%	20.3%

Table A.12.B
Housing Units by Tenure

Tinian Municipality
2000 & 2010 Census

Tenure	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	790	74.9%	874	78.2%	10.6%
Owner-Occupied	279	35.3%	304	34.8%	9.0%
Renter-Occupied	511	64.7%	570	65.2%	11.5%
Vacant Housing Units	265	25.1%	244	21.8%	-7.9%
Total Housing Units	1,055	100.0%	1,118	100.0%	6.0%

Table A.12.C
Housing Units by Tenure

Rota Municipality
2000 & 2010 Census

Tenure	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	757	77.2%	755	72.0%	-0.3%
Owner-Occupied	392	51.8%	327	43.3%	-16.6%
Renter-Occupied	365	48.2%	428	56.7%	17.3%
Vacant Housing Units	224	22.8%	294	28.0%	31.3%
Total Housing Units	981	100.0%	1,049	100.0%	6.9%

Table A.13.A
Disposition of Vacant Housing Units

Saipan Municipality
2000 & 2010 Census

Disposition	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
For Rent	1,637	54.2%	2,383	55.7%	45.6%
For Sale	68	2.3%	41	1.0%	-39.7%
Rented or Sold, Not Occupied	85	2.8%	96	2.2%	12.9%
For Seasonal, Recreational, or Occasional Use	277	9.2%	332	7.8%	19.9%
For Migrant Workers	30	1.0%	24	0.6%	-20.0%
Other Vacant	923	30.6%	1,401	32.8%	51.8%
Total	3,020	100.0%	4,277	100.0%	41.6%

Table A.13.B
Disposition of Vacant Housing Units

Tinian Municipality
2000 & 2010 Census

Disposition	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
For Rent	127	47.9%	101	41.4%	-20.5%
For Sale	10	3.8%	1	0.4%	-90.0%
Rented or Sold, Not Occupied	4	1.5%	6	2.5%	50.0%
For Seasonal, Recreational, or Occasional Use	14	5.3%	9	3.7%	-35.7%
For Migrant Workers	9	3.4%	4	1.6%	-55.6%
Other Vacant	101	38.1%	123	50.4%	21.8%
Total	265	100.0%	244	100.0%	-7.9%

Table A.13.C
Disposition of Vacant Housing Units

Rota Municipality
2000 & 2010 Census

Disposition	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
For Rent	50	22.3%	145	49.3%	190.0%
For Sale	13	5.8%	4	1.4%	-69.2%
Rented or Sold, Not Occupied	6	2.7%	3	1.0%	-50.0%
For Seasonal, Recreational, or Occasional Use	71	31.7%	46	15.6%	-35.2%
For Migrant Workers	6	2.7%	5	1.7%	-16.7%
Other Vacant	78	34.8%	91	31.0%	16.7%
Total	224	100.0%	294	100.0%	31.3%

Table A.14.A
Housing Units by Type

Saipan Municipality
2000 and 2010 Census

Unit Type	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
Single-Family	9,365	60.3%	10,453	55.9%	11.6%
Duplex	463	3.0%	515	2.8%	11.2%
Tri- or Four-Plex	1,242	8.0%	1,195	6.4%	-3.8%
Apartment	4,357	28.1%	6,394	34.2%	46.8%
Mobile Home	53	0.3%	63	0.3%	18.9%
Boat, RV, Van, Etc.	30	0.2%	13	0.1%	-56.7%
Container	17	0.1%	50	0.3%	194.1%
Total	15,527	100.0%	18,683	100.0%	20.3%

Table A.14.B
Housing Units by Type

Tinian Municipality
2000 and 2010 Census

Unit Type	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
Single-Family	719	68.2%	827	74.0%	15.0%
Duplex	41	3.9%	41	3.7%	0.0%
Tri- or Four-Plex	47	4.5%	84	7.5%	78.7%
Apartment	223	21.1%	149	13.3%	-33.2%
Mobile Home	10	0.9%	0	0.0%	-100.0%
Boat, RV, Van, Etc.	7	0.7%	3	0.3%	-57.1%
Container	8	0.8	14	1.3%	75.0%
Total	1,055	100.0%	1,118	100.0%	6.0%

Table A.14.C
Housing Units by Type
Rota Municipality
2000 and 2010 Census

Unit Type	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Single-Family	861	87.8%	830	79.1%	-3.6%
Duplex	18	1.8%	31	3.0%	72.2%
Tri- or Four-Plex	35	3.6%	54	5.1%	54.3%
Apartment	60	6.1%	131	12.5%	118.3%
Mobile Home	4	0.4%	0	0.0%	-100.0%
Boat, RV, Van, Etc.	2	0.2%	0	0.0%	-100.0%
Container	1	0.1%	3	0.3%	200.0%
Total	981	100.0%	1,049	100.0%	6.9%

Table A.15.A
Households by Household Size
Saipan Municipality
2000 & 2010 Census

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	2,408	19.3%	3,166	22.0%	31.5%
Two Persons	2,575	20.6%	3,150	21.9%	22.3%
Three Persons	1,935	15.5%	2,522	17.5%	30.3%
Four Persons	1,810	14.5%	2,209	15.3%	22.0%
Five Persons	1,415	11.3%	1,460	10.1%	3.2%
Six Persons or More	2,364	18.9%	1,899	13.2%	-19.7%
Total	12,507	100.0%	14,406	100.0%	15.2%

Table A.15.B
Households by Household Size
Tinian Municipality
2000 & 2010 Census

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	177	22.4%	203	23.2%	14.7%
Two Persons	148	18.7%	192	22.0%	29.7%
Three Persons	113	14.3%	151	17.3%	33.6%
Four Persons	98	12.4%	131	15.0%	33.7%
Five Persons	85	10.8%	89	10.2%	4.7%
Six Persons or More	169	21.4%	108	12.4%	-36.1%
Total	790	100.0%	874	100.0%	10.6%

Table A.15.C
Households by Household Size
Rota Municipality
2000 & 2010 Census

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	114	15.1%	162	21.5%	42.1%
Two Persons	153	20.2%	173	22.9%	13.1%
Three Persons	97	12.8%	122	16.2%	25.8%
Four Persons	124	16.4%	107	14.2%	-13.7%
Five Persons	99	13.1%	89	11.8%	-10.1%
Six Persons or More	170	22.5%	102	13.5%	-40.0%
Total	757	100.0%	755	100.0%	-0.3%

HOUSING PROBLEMS

Table A.16.A
Overcrowding and Severe Overcrowding

Saipan Municipality
2000 & 2010 Census Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	1,775	45.8%	841	21.7%	1,262	32.5%	3,878
2010 Census	2,757	70.6%	670	17.2%	479	12.3%	3,906
% Change 00–10	55.3%	24.8%	-20.3	-4.5%	-62.0	-20.3%	0.7%
Renter							
2000 Census	5,091	59.0%	1,137	13.2%	2,401	27.8%	8,629
2010 Census	7,416	70.6%	1,548	14.7%	1,536	14.6%	10,500
% Change 00–10	45.7%	11.6%	36.1%	1.6%	-36.0%	-13.2%	21.7%
Total							
2000 Census	6,866	54.9%	1,978	15.8%	3,663	29.3%	12,507
2010 Census	10,173	70.6%	2,218	15.4%	2,015	14.0%	14,406
% Change 00–10	.5%	15.7%	0.1%	-0.4%	-0.4%	-15.3%	0.2%

Table A.16.B
Overcrowding and Severe Overcrowding

Tinian Municipality
2000 & 2010 Census Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	115	41.2%	82	29.4%	82	29.4%	279
2010 Census	202	66.4%	60	19.7%	42	13.8%	304
% Change 00–10	75.7%	25.2%	-26.8%	-9.7%	-48.8	-15.6%	9.0%
Renter							
2000 Census	323	63.2%	49	9.6%	139	27.2%	511
2010 Census	451	79.1%	72	12.6%	47	8.2%	570
% Change 00–10	39.6%	15.9%	46.9%	3.0%	-66.2%	-19.0%	11.5%
Total							
2000 Census	438	55.4%	131	16.6%	221	28.0%	790
2010 Census	653	74.7%	132	15.1%	89	10.2%	874
% Change 00–10	0.5%	19.3%	0.0%	-1.5%	-0.6%	-17.8%	0.1%

Table A.16.C
Overcrowding and Severe Overcrowding

Rota Municipality
2000 & 2010 Census Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	215	54.8%	80	20.4%	97	24.7%	392
2010 Census	229	70.0%	63	19.3%	35	10.7%	327
% Change 00–10	6.5%	15.2%	-21.3%	-1.1%	-63.9%	-14.0%	-16.6%
Renter							
2000 Census	248	67.9%	56	15.3%	61	16.7%	365
2010 Census	330	77.1%	55	12.9%	43	10.0%	428
% Change 00–10	33.1%	9.2%	-1.8%	-2.5%	-29.5%	-6.7%	17.3%
Total							
2000 Census	463	61.2%	136	18.0%	158	20.9%	757
2010 Census	559	74.0%	118	15.6%	78	10.3%	755
% Change 00–10	0.2%	12.9%	-0.1%	-2.3%	-0.5%	-10.5%	0.0%

Table A.17.A
Households with Incomplete Plumbing Facilities

Saipan Municipality
2000 & 2010 Census Data

Households	2000	2010	% Change 00–10
With Complete Plumbing Facilities	10,503	12,372	17.8%
Lacking Complete Plumbing Facilities	2,004	2,034	1.5%
Total Households	12,507	14,406	15.2%
Percent Lacking	16.0%	14.1%	-11.9%

Table A.17.B
Households with Incomplete Plumbing Facilities

Tinian Municipality
2000 & 2010 Census Data

Households	2000	2010	% Change 00–10
With Complete Plumbing Facilities	590	739	25.3%
Lacking Complete Plumbing Facilities	200	135	-32.5%
Total Households	790	874	10.6%
Percent Lacking	25.3%	15.4%	-39.0%

Table A.17.C
Households with Incomplete Plumbing Facilities

Rota Municipality
2000 & 2010 Census Data

Households	2000	2010	% Change 00–10
With Complete Plumbing Facilities	660	713	8.0%
Lacking Complete Plumbing Facilities	97	42	-56.7%
Total Households	757	755	-0.3%
Percent Lacking	12.8%	5.6%	-56.6

Table A.18.A
Households with Incomplete Kitchen Facilities

Saipan Municipality
2000 & 2010 Census Data

Households	2000	2010	% Change 00–10
With Complete Kitchen Facilities	10,139	11,463	13.1%
Lacking Complete Kitchen Facilities	2,368	2,943	24.3%
Total Households	12,507	14,406	15.2%
Percent Lacking	18.9%	20.4%	7.9%

Table A.18.B
Households with Incomplete Kitchen Facilities

Tinian Municipality
2000 & 2010 Census Data

Households	2000	2010	% Change 00–10
With Complete Kitchen Facilities	582	671	15.3%
Lacking Complete Kitchen Facilities	208	203	-2.4%
Total Households	790	874	10.6%
Percent Lacking	26.3%	23.2%	-11.8%

Table A.18.C
Households with Incomplete Kitchen Facilities
Rota Municipality
2000 & 2010 Census Data

Households	2000	2010	% Change 00–10
With Complete Kitchen Facilities	551	564	2.4
Lacking Complete Kitchen Facilities	206	191	-7.3
Total Households	757	755	-0.3%
Percent Lacking	27.2%	25.3%	-7.0%

Table A.19.A
Cost Burden by Tenure
Saipan Municipality
2000 & 2010 Census

2000 & 2010 Census							
Data Source	Less Than 30%		30% and Above		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage							
2000	744	72.9%	269	26.3%	8	0.8%	1,021
2010	729	66.8%	353	32.3%	10	0.9%	1,092
Owner Without a Mortgage							
2000	2,216	91.2%	106	4.4%	109	4.5%	2,431
2010	2,417	85.9%	260	9.2%	137	4.9%	2,814
Renter							
2000	4,523	52.4%	1,520	17.6%	2,586	30.0%	8,629
2010	5,477	52.2%	2,445	23.3%	2,578	24.6%	10,500
Total							
2000	7,483	61.9%	1,895	15.7%	2,703	22.4%	12,081
2010	8,623	59.9%	3,058	21.2%	2,725	18.9%	14,406

Table A.19.B
Cost Burden by Tenure
Tinian Municipality
2000 & 2010 Census

2000 & 2010 Census							
Data Source	Less Than 30%		30% and Above		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage							
2000	62	84.9%	9	12.3%	2	2.7%	73
2010	66	80.5%	16	19.5%	-	-	82
Owner Without a Mortgage							
2000	160	91.4%	5	2.9%	10	5.7%	175
2010	210	94.6%	9	4.1%	3	1.4%	222
Renter							
2000	175	34.2%	45	8.8%	291	56.9%	511
2010	290	50.9%	61	10.7%	219	38.4%	570
Total							
2000	397	52.3%	59	7.8%	303	39.9%	759
2010	566	64.8%	86	9.8%	222	25.4%	874

Table A.19.C
Cost Burden by Tenure

Rota Municipality
2000 & 2010 Census

Data Source	Less Than 30%		30% and Above		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage							
2000	97	68.3%	44	31.0%	1	0.7%	142
2010	70	71.4%	28	28.6%	-	-	98
Owner Without a Mortgage							
2000	192	91.4%	8	3.8%	10	4.8%	210
2010	208	90.8%	20	8.7%	1	0.4%	229
Renter							
2000	116	31.8%	28	7.7%	221	60.5%	365
2010	153	35.7%	69	16.1%	206	48.1%	428
Total							
2000	405	56.5%	80	11.2%	232	32.4%	717
2010	431	57.1%	117	15.5%	207	27.4%	755

Table A.20.A
Median Housing Costs

Saipan Municipality
2000 Census & 2010 Census

Housing Cost	2000	2010
Median Contract Rent	\$372	\$221
Median Home Value	\$161,200	\$127,600

Table A.20.B
Median Housing Costs

Tinian Municipality
2000 Census & 2010 Census

Housing Cost	2000	2010
Median Contract Rent	\$386	\$158
Median Home Value	\$162,200	\$121,200

Table A.20.C
Median Housing Costs

Rota Municipality
2000 Census & 2010 Census

Housing Cost	2000	2010
Median Contract Rent	\$347	\$159
Median Home Value	\$125,000	\$109,900

B. FAIR HOUSING SURVEY OPEN QUESTIONS

FEDERAL, STATE, AND LOCAL LAWS

Table B.1

Where would you refer someone if they felt that their fair housing rights had been violated?

The Commonwealth of Northern Marianas Islands

2015 Fair Housing Survey Data

Comments:
<p>1. Housing mgr. AG Office an attorney Attorney General's Office Boss Can't own land if you don't have local blood (CNMI) CNMI Housing Corporation Director of housing Don't know Don't Know Fair Housing Federal's office or HUD's office Government office H.U.D. Hot Line: 1-800-669-9777 H.U.D/CNMI District Court 42 VSC. Home local security housing assistant Housing housing for more explanation concerning the outcomes Housing NMC (Northern Marianas Corporation) Housing office HUD HUD or AG office HUD's IG I don't know I think the best place to go is to the Northern Marinas Housing (NMHC) Corporation and speak with your caseworker or the director Internet to search for fair housing authority. Labor and housing corp. Legal Service Legal Services Management or Board of Housing Marianas Housing Authority Micronesian Legal Services N.M.H.C. N/A NIHA Housing Nmhc NMHC NMHC office NMHC Office or Attorney General NMHC-Case Worker NMHC/Homeland Security NMI Housing NMPACI and OUR NMPASI No No idea none Northern Marianas Housing Corp Not sure. Not sure. AG's office? Not sure. AG's Office? Office of the attorney general Public Defender Section 8? They should be referred to a place where they won't be discriminated to housing office to one of the lawsuits</p>

To the agency's executive director and/or the HUD Field Office and/or HUD's Inspector General
 US President
 yes-Federal Gov't, NMHC
 your agency

Table B.2
What "Other" type of Tenure are you?
 The Commonwealth of Northern Marianas Islands
 2015 Fair Housing Survey Data

Comments:
construction contractor contractor Currently i do not own it. only staying,under low income. free barracks/ we are paying utility Free renter General Contractor/Construction Household member I'm staying in an old construction barracks which is now. i am responsible in cleaning the place that makes me free to stay live with relative Living with family living with others multi family dwelling No comment from respondent None Other participants Reside on family compound resident Respondent did not fill in Service Provider Soon to be homeowner Stay with my relatives staying with parents Staying with parents visitor with parents

Table B.3
How did you become aware of fair housing laws?
 The Commonwealth of Northern Marianas Islands
 2015 Fair Housing Survey Data

Comments:
because they passed it out been a bldg maintenance contractor since 2010 by friends Contract Agreement policy Fair housing is not an option, its the law Fair Housing Law is an equal opportunity to all qualified person in buying or leasing of houses in CNMI. fair housing laws prohibit discrimination Family member who are under housing assistance family members Former Section 8 Client Government Public info housing does not discriminate against color, race, sex or religion I am landlord of a mainland property. I am under section 8 I am under section 8 so they talk to us about it I am under the section 8 program I became aware of such laws after reading them online due to curiosity I used to work for a public housing authority In regards to question 3: But they're not implemented or enforced in CNMI legal and real estate profession MIHA only U.S citizen not contract worker read about it reading some housing laws relatives Research

second time homeowner
 service to non U.S. people is different than the people from F.S.M.
 Some ethnic groups, the Chuckese are not being treated fairly. many of them have been discriminated
 There is a big sign of it, inside the N.M.H.C. Office, SPN. It's posted on the wall and some are in the lease agreement. but, never
 once been verbalized.
 They supposed to allow contract worker to have a housing that we can pay at least 25 years
 Through interaction with some housing clients.
 updating job to household
 used to be a housing client section 8
 We already apply for housing by I think I was discriminated because of my nationality
 Well I wasn't aware of it, I just read the text above and understand what is "fair housing law."
 When clients have problems I work with legal services on behalf of the client.
 When i first applied and moved in, the housing case worker explained to me about the housing laws.

Table B.4
How should fair housing laws be changed?

The Commonwealth of Northern Marianas Islands
 2015 Fair Housing Survey Data

Comments:
Alien workers Aliens and Refugees Any person who is US Citizen can own land in CNMI By I groups for my understanding are people that are not only in housing but also people who rent houses to other villagers Community Group contract workers with U.S. Citizen children (born in CNMI) Disability Elderly Aged people Federal law For the people FSM, Mainland Americans good personality Group of Management Housing and Foodstamp indigenous IR's citizens (legally married) Legal residents middle class; Nmhc benefits the lower and upper class. What about those who are starting their careers/families and want to own a home? No More! There are many applicants waiting for a house to live in non english speaking groups None only local Other races that is law income that legally staying in CNMI for long period of time people of other races married to a US Citizen people that waited long for assistance Poor displaced people See Above! Stop discrimination against non natives for land ownership. The local people Those who are being evicted and are unable to find available accommodations Those who are not of US Citizen but are homeless and desperately in need of help Victims of violence? Who needs the help more "That Group."

LOCAL FAIR HOUSING

Table B.5
Are there any specific geographic areas that have fair housing problems?

The Commonwealth of Northern Marianas Islands
 2015 Fair Housing Survey Data

Comments:
Prime areas purchased by single owner and tenants being evicted for the reason of new ownership and choice of new tenants when there was no wrong doings with current tenants Saipan San Antonio Kagman See above! Susupe area

The CNMI- in general.
Tinian, Rota, Northern Island

Table B.6
Please share any additional comments.

The Commonwealth of Northern Marianas Islands
2015 Fair Housing Survey Data

Comments:
<p>"we are not U.S. citizens, we are only contract workers but we have U.S. citizen children.: In my opinion, it sounds like good and will benefit everybody.</p> <p>denying someone for housing assistance in help of need isn't fair</p> <p>fair housing</p> <p>fair Housing is very beneficial to the commonwealth especially low income, senior citizens</p> <p>Fair housing part is fine. except for the part that we nearly almost die inside our unit during the typhoon Soudelor, Tornado wind destruction. Due to no plywood to cover some of our windows. And all the woods and materials are very old. majority of my housing issues are uninhabitable matters or dwelling. Inadequate maintenance.</p> <p>FAIR.</p> <p>Get a grass roots organization.</p> <p>Housing Authority cannot accommodate the amount of applicants</p> <p>I don't about housing</p> <p>I don't know</p> <p>I dont No About Housing</p> <p>I hope this is fair with no race discrimination</p> <p>I Romaha don't have any comment</p> <p>I think it is right and going well</p> <p>I would like to know about fair housing!</p> <p>if a homeowner is hospitalized they should not be forced to sign away check for construction co.</p> <p>Individual home visits should be done to make more people be aware and understand the Fair Housing Act</p> <p>Is there anyway that own land a US Citizen even they doesn't have a local (CNMI) blood.</p> <p>Lack of service for me and my child & denial of assistance</p> <p>Monopoly owner buying up properties and evicting all tenants when there is no other accommodations available on island. Prices are higher and there is just no rooms available for the general public</p> <p>my comment why our unit not it fix? after the typhoon unit now</p> <p>N/A</p> <p>Need to educate more of the housing policies and laws to the communities</p> <p>NMHC should look into educating their clients on their rights and current issues pertaining housing; for example meetings every 3 months</p> <p>no educational/knowning to the public</p> <p>none</p> <p>Not sure if this relates, but I feel cheated in trying to find a good home without the dread of financial stress. I like the idea of a rental only because of the fact just about everything is there and ready for use. But when you look at the minimum wage level here, factor in the amount of rental charged per household, it just doesn't seem to fair to me. Trying to get a place of our own seems a bigger feat than anything we've had to face. Kids are growing and space is now an issue when living with other family members.</p> <p>pls. allow contract worker or low income not only U.S citizen or FMS</p> <p>soon as possible</p> <p>That your office is fair and has made no race discrimination</p> <p>the specific housing given to was not clean (very filthy)/existing doors and windows were all broken and termite infested. I was informed to provide own contractor to work on house (replace all doors and window's, closets, sinks, plumbing's, etc.) and total cost of this renovation was added (billed) to me on top of my total expense for the house rental. I do not think this is fair because in my opinion, this house should have been a clean and livable environment before given to an individual.</p> <p>There is a limit of people in a household and electricity voucher allowance and I think that needs to be seen and discussed</p> <p>What is this survey for, and how will it improve to people living in the "housing area"</p> <p>With its limited staff and resources, NMHC continues to do an outstanding job under the guidance and leadership of Mr. Jesse S. Palacios.</p>

FAIR HOUSING IN THE PRIVATE SECTOR

Table B.7
Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?

The Commonwealth of Northern Marianas Islands
2015 Fair Housing Survey Data

Comments:
<p>Building not accessible</p> <p>Chinese, renting only to Philipinos Locals, renting to groups in which it can manipulate.</p> <p>CNMH Housing is not fair</p>

landlord or property management won't rent to CW
 None
 Other class of people who are not eligible should be if its called "fair" housing in America we can shelter everybody
 Race and plenty of kids landlord refuses
 Refusing to rent based on color.
 Some owners refuse to rent to certain nationalities or charge more for others!
 The loose money like that. they should give the available units to anyone as long as there criminal records are fine
 Unemployment. Cannot afford rental

Table B.8

Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?

The Commonwealth of Northern Marianas Islands
 2015 Fair Housing Survey Data

Comments:
CK, Kagman, Oleai None not enough area for children to play They should show them any where as long as it meets the estimated price

Table B.9

Are you aware of any questionable practices or barriers to fair housing choices in the mortgage industry?

The Commonwealth of Northern Marianas Islands
 2015 Fair Housing Survey Data

Comments:
All Banks on the CNMI and CDA in included! None very expensive. women-not enough approved

Table B.10

Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?

The Commonwealth of Northern Marianas Islands
 2015 Fair Housing Survey Data

Comments:
accessibility to complex(sidewalks, paired parking) According to some occatess or sometimes in area of person die, the casket couldn't fit in the doorway Especially Chinese properties its better just in case of a family member with disability N/A Some construction companies abuse the homeowner by taking the money and not paying their employees and the homeowner is stuck with remodeling their home that has a lot of mistakes There is NO monitoring builders (old & new building) to come up to code for disabilities! wheelchairs should be thought of too

Table B.11

Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?

The Commonwealth of Northern Marianas Islands
 2015 Fair Housing Survey Data

Comments:
All insurers on the CNMI Century Insurance is limiting issuance of claim hoping that homeowners can take their denials to FEMA. This is bad faith practice and should be looked into I can always feel discrimination in these islands in many different ways. especially to the contract worker N/A Sometimes when we receive high amount of income we don't qualify there are some buildings here don't have parking for the disabilities

Table B.12
Are you aware of any questionable practices or barriers to fair housing choice for “other” housing services?

The Commonwealth of Northern Marianas Islands
2015 Fair Housing Survey Data

Comments:
<p>Availability of materials on the islands</p> <p>Delay applicants applying for housing for too long. Social workers may be racial due to ethnicity.</p> <p>Housing choices favoring Chinese, Whites and Philipinos</p> <p>maintenance is slow</p> <p>mostly contractor to HUD program, were Filipino so good service to them and the others but not to F.S.M. people</p> <p>N/A</p> <p>need more reliable services especially those with no vehicles</p> <p>Plumbing, fixing doors, fixing window shutters, maintenance work. These services of works, used to be good, but now a days it's getting hard. Whatever problem we have in our unit, we have fixed it. Ever since the new boss of the housing changed, everything is changing.</p> <p>Sablan Construction dba JAG Inc</p> <p>Section 8</p> <p>Section 8. They should amend the one that's been on the waiting list for a long time</p> <p>The section 8 housing program</p> <p>This year, most of my calls to NMHC's mortgage and Section 8 divisions are neither answered or returned.</p>

FAIR HOUSING IN THE PUBLIC SECTOR
Table B.13
Are you aware of any questionable practices or barriers to fair housing choice in land use policies?

The Commonwealth of Northern Marianas Islands
2015 Fair Housing Survey Data

Comments:
<p>when limiting the amount of people in one "housing "home</p>

Table B.14
Are you aware of any questionable practices or barriers to fair housing choice in occupancy zoning codes?

The Commonwealth of Northern Marianas Islands
2015 Fair Housing Survey Data

Comments:
<p>Manipulation of public lands and zoning of top 3% of the controllin gChamorro group - so as to squeeze out the greatest "profits" via Chinese "Investment"</p> <p>N/A</p> <p>None of the above</p> <p>To much discrimination here</p> <p>Too many requirements/conditions</p>

Table B.15
Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?

The Commonwealth of Northern Marianas Islands
2015 Fair Housing Survey Data

Comments:
<p>As far as I can tell either codes don't exist or aren't enforced anywhere. Housing authorities need to take care of of the vacant properties they "own" rather than let them become wild or rot.</p> <p>Chinese apartment operators in Garapan letting typhoon damaged apartments and expecting a tenant to pay for the repairs to the apartment with no compensation for expenses, such as a trade for repairs in lieu of rent.</p> <p>many homes have multiple people living w/ them (fire hazard)</p> <p>N/A</p> <p>Not Enforced!!</p> <p>Yes, CNMI NOT enforcing codes on all buildings especially in certain areas!</p>

Table B.16

Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?

The Commonwealth of Northern Marianas Islands
2015 Fair Housing Survey Data

Comments:
in this area all the F.S.M. people were not covered or have assistance for this program (disabled people) N/A Not fairly applied to all.

Table B.17

Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?

The Commonwealth of Northern Marianas Islands
2015 Fair Housing Survey Data

Comments:
One start application This is certainly an Issue

Table B.18

Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?

The Commonwealth of Northern Marianas Islands
2015 Fair Housing Survey Data

Comments:
I do think it's unfair that there is an accessible basketball court at Koblerville Housing and not have in Harapan. Children walk down to the basketball court at Carolinain UTT and came home late More request but no action or the work is unfinished N/A NMHC needs to hire a full-time licensed engineer. NO or NOT enough control or monitoring! Also NOT enough rules! Sablan Construction dba JAG Construction short of construction companies on Tinian The CNMI has no enforcement of the American Building Codes

Table B.19

Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?

The Commonwealth of Northern Marianas Islands
2015 Fair Housing Survey Data

Comments:
I do not have access to my property even though records indicate easement access exists because of neighbors enroaching on my property and DPW, DPL not enforcing the easement N/A Neighborhood don't practice the policies There Exists None!

Table B.20

Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?

The Commonwealth of Northern Marianas Islands
2015 Fair Housing Survey Data

Comments:
Commonwealth's government Labor and WA Lack of mass transit Lack of transportation, extremely high down payments and interest rates for mortgages for middle income persons. All given to low income who often end up foreclosing on the property. N/A Need more Public Transportation! There are too numerous to name- Especially Socio Cultural upbringing.

transportation, employment

Table B.21

Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?

The Commonwealth of Northern Marianas Islands
2015 Fair Housing Survey Data

Comments:
Again, some people are discriminated against based on their place of birth or ethnicity, and not allowed to purchase land in CNMI.
availability of public buildings for use by individuals with disabilities
give the one that is in need
N/A
NMPASI/Karidat/Representative Kilili Sablan
none of the above
See ALL that apply above!
The CNMI corrupt government as a whole acts as a mechanism to deter pro active involvement on a grass roots level!

C. COMMUNITY REINVESTMENT ACT TABLES

I. THE COMMONWEALTH OF NORTHERN MARIANA ISLANDS

Table C.I.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
The Commonwealth of Northern Mariana Islands
2000–2014 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	0	0	0	0	146	146
2001	0	0	0	0	89	89
2002	0	0	0	0	97	97
2003	0	0	0	0	97	97
2004	0	4	78	31	0	113
2005	0	7	77	23	0	107
2006	0	5	70	13	0	88
2007	0	6	87	14	0	107
2008	0	3	69	11	0	83
2009	0	0	54	13	0	67
2010	0	1	89	18	0	108
2011	0	11	186	24	0	221
2012	0	18	98	19	0	135
2013	0	17	121	20	0	158
2014	0	20	88	14	0	122
Total	0	92	1,017	200	429	1,738
Loan Amount (\$1,000s)						
2000	0	0	0	0	3,546	3,546
2001	0	0	0	0	2,423	2,423
2002	0	0	0	0	2,792	2,792
2003	0	0	0	0	2,613	2,613
2004	0	115	2,861	833	0	3,809
2005	0	163	1,825	471	0	2,459
2006	0	175	1,654	161	0	1,990
2007	0	152	2,185	415	0	2,752
2008	0	50	1,894	383	0	2,327
2009	0	0	1,757	405	0	2,162
2010	0	50	2,811	623	0	3,484
2011	0	64	3,337	617	0	4,018
2012	0	277	2,732	525	0	3,534
2013	0	543	3,385	752	0	4,680
2014	0	367	2,378	598	0	3,343
Total	0	1,956	26,819	5,783	11,374	45,932

Table C.I.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI

The Commonwealth of Northern Mariana Islands
2000–2013 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	0	0	0	0	8	8
2001	0	0	0	0	7	7
2002	0	0	0	0	11	11
2003	0	0	0	0	7	7
2004	0	1	6	1	0	8
2005	0	2	2	2	0	6
2006	0	1	5	1	0	7
2007	0	2	4	0	0	6
2008	0	1	8	0	0	9
2009	0	1	8	1	0	10
2010	0	1	6	0	0	7
2011	0	1	5	0	0	6
2012	0	2	2	1	0	5
2013	0	3	9	4	0	16
2014	0	2	4	1	0	7
Total	0	17	59	11	33	120
Loan Amount (\$1,000s)						
2000	0	0	0	0	1,331	1,331
2001	0	0	0	0	1,223	1,223
2002	0	0	0	0	1,942	1,942
2003	0	0	0	0	1,021	1,021
2004	0	250	1,109	150	0	1,509
2005	0	265	323	375	0	963
2006	0	158	1,030	111	0	1,299
2007	0	347	720	0	0	1,067
2008	0	200	1,765	0	0	1,965
2009	0	200	1,568	150	0	1,918
2010	0	200	1,065	0	0	1,265
2011	0	200	1,005	0	0	1,205
2012	0	450	300	150	0	900
2013	0	700	1,544	634	0	2,878
2014	0	450	678	108	0	1,236
Total	0	3,420	11,107	1,678	5,517	21,722

Table C.I.3
Small Business Loans Originated: More than \$250,000 by Tract MFI

The Commonwealth of Northern Mariana Islands
2000–2013 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	0	0	0	0	11	11
2001	0	0	0	0	4	4
2002	0	0	0	0	3	3
2003	0	0	0	0	7	7
2004	0	0	8	2	0	10
2005	0	0	5	0	0	5
2006	0	0	3	1	0	4
2007	0	0	2	0	0	2
2008	0	0	2	2	0	4
2009	0	0	4	2	0	6
2010	0	2	4	0	0	6
2011	0	1	5	1	0	7
2012	0	0	4	0	0	4
2013	0	0	4	0	0	4
2014	0	0	4	1	0	5
Total	0	3	45	9	25	82
Loan Amount (\$1,000s)						
2000	0	0	0	0	5,287	5,287
2001	0	0	0	0	1,555	1,555
2002	0	0	0	0	2,163	2,163
2003	0	0	0	0	2,985	2,985
2004	0	0	3,680	1,345	0	5,025
2005	0	0	2,067	0	0	2,067
2006	0	0	1,500	400	0	1,900
2007	0	0	780	0	0	780
2008	0	0	779	793	0	1,572
2009	0	0	1,650	850	0	2,500
2010	0	800	1,977	0	0	2,777
2011	0	500	2,233	350	0	3,083
2012	0	0	1,850	0	0	1,850
2013	0	0	1,950	0	0	1,950
2014	0	0	1,720	600	0	2,320
Total	0	1,300	20,186	4,338	11,990	37,814

Table C.I.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI

The Commonwealth of Northern Mariana Islands

2000–2012 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	0	0	0	0	144	144
2001	0	0	0	0	77	77
2002	0	0	0	0	77	77
2003	0	0	0	0	88	88
2004	0	5	71	30	0	106
2005	0	9	69	20	0	98
2006	0	3	61	7	0	71
2007	0	6	76	12	0	94
2008	0	2	60	8	0	70
2009	0	0	41	8	0	49
2010	0	1	61	15	0	77
2011	0	11	156	17	0	184
2012	0	17	83	15	0	115
2013	0	16	98	15	0	129
2014	0	18	61	11	0	90
Total	0	88	837	158	386	1,469
Loan Amount (\$1,000s)						
2000	0	0	0	0	8,291	8,291
2001	0	0	0	0	3,563	3,563
2002	0	0	0	0	4,308	4,308
2003	0	0	0	0	4,221	4,221
2004	0	365	4,241	883	0	5,489
2005	0	428	2,065	296	0	2,789
2006	0	55	1,927	42	0	2,024
2007	0	152	2,160	315	0	2,627
2008	0	20	2,411	271	0	2,702
2009	0	0	1,202	145	0	1,347
2010	0	50	3,092	483	0	3,625
2011	0	64	3,100	317	0	3,481
2012	0	257	2,629	495	0	3,381
2013	0	643	2,776	684	0	4,103
2014	0	326	1,675	967	0	2,968
Total	0	2,360	27,278	4,898	20,383	54,919

II. SAIPAN MUNICIPALITY

Table C.II.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI

Saipan Municipality
2000–2014 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	0	0	0	0	137	137
2001	0	0	0	0	87	87
2002	0	0	0	0	92	92
2003	0	0	0	0	90	90
2004	0	4	78	31	0	113
2005	0	7	77	23	0	107
2006	0	5	70	13	0	88
2007	0	6	87	14	0	107
2008	0	3	69	11	0	83
2009	0	0	54	13	0	67
2010	0	1	89	18	0	108
2011	0	11	186	24	0	221
2012	0	18	97	19	0	134
2013	0	17	121	20	0	158
2014	0	20	87	14	0	121
Total	0	92	1,015	200	406	1,713
Loan Amount (\$1,000s)						
2000	0	0	0	0	3,195	3,195
2001	0	0	0	0	2,298	2,298
2002	0	0	0	0	2,536	2,536
2003	0	0	0	0	2,494	2,494
2004	0	115	2,861	833	0	3,809
2005	0	163	1,825	471	0	2,459
2006	0	175	1,654	161	0	1,990
2007	0	152	2,185	415	0	2,752
2008	0	50	1,894	383	0	2,327
2009	0	0	1,757	405	0	2,162
2010	0	50	2,811	623	0	3,484
2011	0	64	3,337	617	0	4,018
2012	0	277	2,682	525	0	3,484
2013	0	543	3,385	752	0	4,680
2014	0	367	2,373	598	0	3,338
Total	0	1,956	26,764	5,783	10,523	45,026

Table C.II.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI

Saipan Municipality
2000–2013 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	0	0	0	0	7	7
2001	0	0	0	0	6	6
2002	0	0	0	0	10	10
2003	0	0	0	0	6	6
2004	0	1	6	1	0	8
2005	0	2	2	2	0	6
2006	0	1	5	1	0	7
2007	0	2	4	0	0	6
2008	0	1	8	0	0	9
2009	0	1	8	1	0	10
2010	0	1	6	0	0	7
2011	0	1	5	0	0	6
2012	0	2	2	1	0	5
2013	0	3	9	4	0	16
2014	0	2	4	1	0	7
Total	0	17	59	11	29	116
Loan Amount (\$1,000s)						
2000	0	0	0	0	1,131	1,131
2001	0	0	0	0	1,022	1,022
2002	0	0	0	0	1,746	1,746
2003	0	0	0	0	905	905
2004	0	250	1,109	150	0	1,509
2005	0	265	323	375	0	963
2006	0	158	1,030	111	0	1,299
2007	0	347	720	0	0	1,067
2008	0	200	1,765	0	0	1,965
2009	0	200	1,568	150	0	1,918
2010	0	200	1,065	0	0	1,265
2011	0	200	1,005	0	0	1,205
2012	0	450	300	150	0	900
2013	0	700	1,544	634	0	2,878
2014	0	450	678	108	0	1,236
Total	0	3,420	11,107	1,678	4,804	21,009

Table C.II.3
Small Business Loans Originated: More than \$250,000 by Tract MFI

Saipan Municipality
2000–2013 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	0	0	0	0	8	8
2001	0	0	0	0	3	3
2002	0	0	0	0	3	3
2003	0	0	0	0	7	7
2004	0	0	8	2	0	10
2005	0	0	5	0	0	5
2006	0	0	3	1	0	4
2007	0	0	2	0	0	2
2008	0	0	2	2	0	4
2009	0	0	4	2	0	6
2010	0	2	4	0	0	6
2011	0	1	5	1	0	7
2012	0	0	4	0	0	4
2013	0	0	4	0	0	4
2014	0	0	4	1	0	5
Total	0	3	45	9	21	78
Loan Amount (\$1,000s)						
2000	0	0	0	0	4,018	4,018
2001	0	0	0	0	1,205	1,205
2002	0	0	0	0	2,163	2,163
2003	0	0	0	0	2,985	2,985
2004	0	0	3,680	1,345	0	5,025
2005	0	0	2,067	0	0	2,067
2006	0	0	1,500	400	0	1,900
2007	0	0	780	0	0	780
2008	0	0	779	793	0	1,572
2009	0	0	1,650	850	0	2,500
2010	0	800	1,977	0	0	2,777
2011	0	500	2,233	350	0	3,083
2012	0	0	1,850	0	0	1,850
2013	0	0	1,950	0	0	1,950
2014	0	0	1,720	600	0	2,320
Total	0	1,300	20,186	4,338	10,371	36,195

Table C.II.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI

Saipan Municipality
2000–2012 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	0	0	0	0	132	132
2001	0	0	0	0	73	73
2002	0	0	0	0	71	71
2003	0	0	0	0	80	80
2004	0	5	71	30	0	106
2005	0	9	69	20	0	98
2006	0	3	61	7	0	71
2007	0	6	76	12	0	94
2008	0	2	60	8	0	70
2009	0	0	41	8	0	49
2010	0	1	61	15	0	77
2011	0	11	156	17	0	184
2012	0	17	82	15	0	114
2013	0	16	98	15	0	129
2014	0	18	61	11	0	90
Total	0	88	836	158	356	1,438
Loan Amount (\$1,000s)						
2000	0	0	0	0	6,474	6,474
2001	0	0	0	0	2,887	2,887
2002	0	0	0	0	3,856	3,856
2003	0	0	0	0	3,986	3,986
2004	0	365	4,241	883	0	5,489
2005	0	428	2,065	296	0	2,789
2006	0	55	1,927	42	0	2,024
2007	0	152	2,160	315	0	2,627
2008	0	20	2,411	271	0	2,702
2009	0	0	1,202	145	0	1,347
2010	0	50	3,092	483	0	3,625
2011	0	64	3,100	317	0	3,481
2012	0	257	2,579	495	0	3,331
2013	0	643	2,776	684	0	4,103
2014	0	326	1,675	967	0	2,968
Total	0	2,360	27,228	4,898	17,203	51,689

III. ROTA MUNICIPALITY

Table C.III.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
Rota Municipality
2000–2014 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	0	0	0	0	9	9
2001	0	0	0	0	2	2
2002	0	0	0	0	5	5
2003	0	0	0	0	7	7
2004	0	0	0	0	0	0
2005	0	0	0	0	0	0
2006	0	0	0	0	0	0
2007	0	0	0	0	0	0
2008	0	0	0	0	0	0
2009	0	0	0	0	0	0
2010	0	0	0	0	0	0
2011	0	0	0	0	0	0
2012	0	0	1	0	0	1
2013	0	0	0	0	0	0
2014	0	0	1	0	0	1
Total	0	0	2	0	23	25
Loan Amount (\$1,000s)						
2000	0	0	0	0	351	351
2001	0	0	0	0	125	125
2002	0	0	0	0	256	256
2003	0	0	0	0	119	119
2004	0	0	0	0	0	0
2005	0	0	0	0	0	0
2006	0	0	0	0	0	0
2007	0	0	0	0	0	0
2008	0	0	0	0	0	0
2009	0	0	0	0	0	0
2010	0	0	0	0	0	0
2011	0	0	0	0	0	0
2012	0	0	50	0	0	50
2013	0	0	0	0	0	0
2014	0	0	5	0	0	5
Total	0	0	55	0	851	906

Table C.III.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI

Rota Municipality
2000–2013 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	0	0	0	0	1	1
2001	0	0	0	0	1	1
2002	0	0	0	0	1	1
2003	0	0	0	0	1	1
2004	0	0	0	0	0	0
2005	0	0	0	0	0	0
2006	0	0	0	0	0	0
2007	0	0	0	0	0	0
2008	0	0	0	0	0	0
2009	0	0	0	0	0	0
2010	0	0	0	0	0	0
2011	0	0	0	0	0	0
2012	0	0	0	0	0	0
2013	0	0	0	0	0	0
2014	0	0	0	0	0	0
Total	0	0	0	0	4	4
Loan Amount (\$1,000s)						
2000	0	0	0	0	200	200
2001	0	0	0	0	201	201
2002	0	0	0	0	196	196
2003	0	0	0	0	116	116
2004	0	0	0	0	0	0
2005	0	0	0	0	0	0
2006	0	0	0	0	0	0
2007	0	0	0	0	0	0
2008	0	0	0	0	0	0
2009	0	0	0	0	0	0
2010	0	0	0	0	0	0
2011	0	0	0	0	0	0
2012	0	0	0	0	0	0
2013	0	0	0	0	0	0
2014	0	0	0	0	0	0
Total	0	0	0	0	713	713

Table C.III.3
Small Business Loans Originated: More than \$250,000 by Tract MFI

Rota Municipality
2000–2013 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	0	0	0	0	3	3
2001	0	0	0	0	1	1
2002	0	0	0	0	0	0
2003	0	0	0	0	0	0
2004	0	0	0	0	0	0
2005	0	0	0	0	0	0
2006	0	0	0	0	0	0
2007	0	0	0	0	0	0
2008	0	0	0	0	0	0
2009	0	0	0	0	0	0
2010	0	0	0	0	0	0
2011	0	0	0	0	0	0
2012	0	0	0	0	0	0
2013	0	0	0	0	0	0
2014	0	0	0	0	0	0
Total	0	0	0	0	4	4
Loan Amount (\$1,000s)						
2000	0	0	0	0	1,269	1,269
2001	0	0	0	0	350	350
2002	0	0	0	0	0	0
2003	0	0	0	0	0	0
2004	0	0	0	0	0	0
2005	0	0	0	0	0	0
2006	0	0	0	0	0	0
2007	0	0	0	0	0	0
2008	0	0	0	0	0	0
2009	0	0	0	0	0	0
2010	0	0	0	0	0	0
2011	0	0	0	0	0	0
2012	0	0	0	0	0	0
2013	0	0	0	0	0	0
2014	0	0	0	0	0	0
Total	0	0	0	0	1,619	1,619

Table C.III.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI

Rota Municipality
2000–2012 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	0	0	0	0	12	12
2001	0	0	0	0	4	4
2002	0	0	0	0	6	6
2003	0	0	0	0	8	8
2004	0	0	0	0	0	0
2005	0	0	0	0	0	0
2006	0	0	0	0	0	0
2007	0	0	0	0	0	0
2008	0	0	0	0	0	0
2009	0	0	0	0	0	0
2010	0	0	0	0	0	0
2011	0	0	0	0	0	0
2012	0	0	1	0	0	1
2013	0	0	0	0	0	0
2014	0	0	0	0	0	0
Total	0	0	1	0	30	31
Loan Amount (\$1,000s)						
2000	0	0	0	0	1,817	1,817
2001	0	0	0	0	676	676
2002	0	0	0	0	452	452
2003	0	0	0	0	235	235
2004	0	0	0	0	0	0
2005	0	0	0	0	0	0
2006	0	0	0	0	0	0
2007	0	0	0	0	0	0
2008	0	0	0	0	0	0
2009	0	0	0	0	0	0
2010	0	0	0	0	0	0
2011	0	0	0	0	0	0
2012	0	0	50	0	0	50
2013	0	0	0	0	0	0
2014	0	0	0	0	0	0
Total	0	0	50	0	3,180	3,230

D. HUD RESPONSE TO REQUEST FOR FAIR HOUSING COMPLAINT DATA

Figure D.1 Response from HUD Representative to Request for Complaint Data

Northern Mariana Islands
Personal Correspondence

From: Coe, Chloe [mailto:Chloe.Coe@hud.gov]
Sent: Tuesday, August 04, 2015 2:19 PM
To: Robert Gaudin; Kristen Bennett
Cc: Gums, Vicki A; Jackson, Jeff
Subject: Fair Housing Complaint Data request for N. Mariana Islands

Mr. Gaudin and Ms. Bennett,

Your office had requested fair housing complaint data that was filed with HUD's Office of Fair Housing and Equal Opportunity from January 1, 2008 to the present in the Northern Mariana Islands. Based on a search of the data, I found no complaints filed there between those dates. Please note that the lack of complaints filed does not necessarily indicate that there were no discriminatory housing practices within that area during that time. It may indicate a need for further education and outreach efforts to inform the population of its fair housing rights under the laws. Let me know if you need anything further.

Sincerely,

Chloé Coe
Equal Opportunity Specialist
FHEO
San Francisco
415-489-6541
TTY: 415-489-6564

